

# Personal Data Processing Notice

The purpose of this Personal Data Processing Notice is provide concise information on handling your personal data collected by the data controller (as defined below) in accordance with legal regulations, including the General Data Protection Regulation of the European Union (the “GDPR”). Your personal data will be processed by the controller in line with the conditions set forth herein.

## Data controller

The data controller is **Adamantem HR s.r.o.**, Company ID: 116 955 01, office: Březiněveská 1853/29, Praha 8, 182 00, Czech Republic.

The controller will process the personal data collected.

This Personal Data Processing Notice applies to (1) persons whom we help find employment, and recipients of our career services, such as outplacement, (2) our agency employees who are assigned temporarily for work with our clients, and suppliers (natural persons) who we use to perform contracts for our clients, (3) users of the websites and applications (hereinafter the “Websites”), (4) representatives of our business partners and clients, (5) persons whose personal data we use for our marketing activities, and (6) persons who recommend us the persons who are interested in employment intermediation. This Personal Data Processing Notice does not apply to employees who work directly for Adamantem HR s.r.o.

Additionally, this Personal Data Processing Notice delineates the various categories of personal data collected about you, the ways we use, process and protect these data, the period during which these data are retained, the persons with whom we share these data, the countries where we transfer them, as well as the rights that you, as an individual, have in connection with the fact that your personal data are used by us. In this document you will also find information as to how contact us with regard to our privacy protection measures and advice how your rights can be exercised. Our privacy protection measures may vary in the individual countries where we operate since these measures should reflect the local practice and legislative requirements; for details of specific local circumstances please visit the local websites.

## Personal data collected by us

We can collect your personal data in different ways, for example through our Websites, social media channels or other Internet applications; at our events; by telephone or fax; during personal meetings in association with employment intermediation; or in connection with interactions with our business partners and clients. We can collect selected personal data subject to the nature of our relationship with you, in particular (to the extent permitted by local legal regulations):

- contact information (e.g. a name, mailing address, electronic mail address and telephone number);
- user name and password if you register on our Websites;
- information you provide about your friends or other people you want us to contact (the controller assumes that these persons have given their prior consent to such communication); and
- other information you provide us, e.g. in case of surveys or through the icon “Contact us” on our Websites.

If you are a temporary assignment employee or a job seeker, apply for a certain work position or have created an account in order to apply for a certain work position, we may collect the following categories of personal data (to the extent permitted by local legal regulations):

- work history and history of completed education levels;

- language skills and other abilities related to employment;
- birth registration number;
- data of birth;
- sex;
- information about your bank account;
- citizenship and work permit status;
- tax-related information;
- information provided from third persons as references;
- information included in your CV;
- information you provide with respect to your career interests and other information about your qualifications for employment; and
- information related to your employment with our company or our client,

and

where allowed or required by legal regulations:

- information about your disability and health;
- results of drug tests, information about criminal probity and other reliability checks.

Moreover, we may collect information provided by you about other persons, e.g. contact details for emergency situations.

## **Ways we use personal data collected**

The controller uses the collected data for the following purposes (to the extent permitted by local legal regulations):

- a. intermediation of employment;
- b. creation and management of online accounts;
- c. payroll processing;
- d. management of our relationships with clients and business partners;
- e. provision of information of special events, programmes, offers, opinion polls, open competitions and market surveys and provision of participation therein;
- f. replies to your questions and requirements;
- g. operation, assessment and improvement of our business activities (including the development, improvement, analysing and upgrading of our services; management of our notices; performance of data analyses; bookkeeping, performance of audits and other internal functions);
- h. protection against frauds and other illegal activities, exposing and preventing the same;
- i. handling complaints and defence of legal claims; and
- j. compliance with and enforcement of valid legal requirements, applicable industrial standards, contractual obligations and our policies.

All data processing will be done on the basis of valid legal grounds, including but not limited to the following:

- a. your consent or explicit consent, if so required by valid legal regulations (e.g. processing of your personal data for our marketing activities or continuous intermediation of employment);
- b. ensuring that we will meet obligations imposed on us by legal regulations (e.g. compliance with the employer's registration obligation or payment of your income tax to state authorities). In such cases, the provision of your personal data constitutes a requirement of legal regulations and there exists an obligation to provide these personal data; your refusal to provide the personal data required may lead to damage incurred to you or us.
- c. ensuring that we will meet obligations from a contract we have concluded with you (e.g. to assign you temporarily for work with our client or to pay you wages in the appropriate amount) or that we will take any necessary steps before concluding a contract in which you are interested (e.g. to be able to enter into a contract of employment with you or to provide you with a career service). In such cases, the provision of the required personal data constitutes a necessary requirement of a contract or for entering into a contract; your refusal to provide the required personal data will prevent us from performing our contractual obligations and we would therefore be unable to enter into the contract with you.
- d. necessity for a legitimate interest of the controller, as further described below (e.g. making accessible the Websites to the user for the provision of the services offered or for the calculation of our fee that we charge to our clients).

In addition to the activities referred to above, if you are a temporary assignment employee or a job seeker, apply for a certain work position or have created an account in order to apply for a certain work position, to the extent permitted by local legal regulations, we use your personal data, as delineated above, for the following purposes:

- a. find job opportunities and a job for you;
- b. provide you with human resources services;
- c. provide you with other services, such as trainings, career consultancy and services for persons changing an occupation;
- d. assessment whether you are a suitable job seeker and assessment of the suitability of your qualification for the given positions; and
- e. completion of data analyses, e.g. (i) analysis of our database of job seekers and temporarily assigned employees; (ii) evaluation of individual performance and competence, including assessment of work skills; (iii) determination of any lacks of work skills; (iv) use of information to interconnect individuals with potential opportunities; and (v) analysis of pipeline data (trends related to recruitment procedures).

We will advise you in a separate notice in advance if we intend to use the above information in other manners.

## Legitimate interest

The data controller may process your personal data for a certain legitimate interest, by way of example:

- improvement and personalization of our services and notices in favour of our clients, job seekers and temporarily assigned employees;
- exposure and prevention of frauds;
- reinforcement of the security of our network and our information systems;
- better understanding of how people communicate with our Websites;

- direct marketing;
- distribution of notices which we believe might be of your interest;
- determination of the efficacy of promotional campaigns and advertising;
- assertion of our rights *vis-à-vis* you or our clients and business partners;
- fulfilment of contractual obligations to your clients or business partners.

At all times when we process data for these purposes, we make sure that a high level of your rights is maintained and your rights taken into account. You have a right to object to such processing, and in case you wish to raise an objection, contact us at any of the addresses listed in the section Ways to contact us. Please remember that in case you exercise your right to object, this may affect our ability to provide and deliver our services to you for your benefit.

## Ways we process and protect your personal data

The personal data collected are processed for the purposes specified herein and for the period necessary with respect to the purposes for which we have collected them. Under various legal regulations, we may be obligated to retain various data for different periods.

We have introduced administrative, technical and physical measures with the aim of protecting the personal data provided by you against any incidental, unlawful or unauthorized destruction, loss, modification, access, disclosure or misuse. We employ the following security measures to ensure an adequate level of security and confidentiality of personal data:

- encryption of data transferred;
- strict checks of verification of users;
- reinforced network infrastructure;
- solutions in the area of network supervision

## Retention period of data collected by us

We retain the collected personal data in our system to enable your identification over a maximum period necessary with respect to the purpose for which your personal data were collected or for which your personal data are processed.

This specific period is determined with respect to the following:

- necessity to retain the collected and stored personal data for the purpose of offering and providing the services you require;
- ensuring a legitimate interest of the data controller, as described above;
- existence of particular legal or contractual obligations due to which the processing and the related retention for a specific period are necessary.

## Personal data shared by us

We never disclose the personal data collected about you, excepting the cases specified in this Personal Data Processing Notice or in separate notices provided in connection with particular activities. We may share your personal data with our business partners who render services for our benefit and based on our instructions. These business partners are not authorized by us to use or disclose personal data, except when it is necessary to provide services for our benefit or to satisfy requirements of legal regulations. Moreover, we may share your personal data (i) with our subsidiaries and legally-connected companies; (ii) if you are a job seeker, your personal data may be shared with clients who may have at their disposal job opportunities or might be interested in placing our job seekers, or, as the case may be, with other persons with whom we

cooperate, such as external advisors or translators, whereby our objective is to find employment for you or help you enter the labour market in the Czech Republic; and (iv) with legal and tax advisors, if necessary for the fulfilment of our legal obligations of defence of legal claims.

In addition, we may disclose the personal data collected about you (i) provided that we are required to do so by legal regulations or on the basis of a legal process; (ii) to law enforcement authorities or other state authorities by virtue of a lawful application for disclosure; and (iii) if we believe that such disclosure is necessary or expedient in order to prevent a physical or financial loss, or in connection with an investigation into a suspicion of fraudulent or illegal activities or connection with actual fraudulent or illegal activities. Furthermore, we reserve the right to transfer the personal data we keep about you if we sell or assign the whole or a part of our business or all our assets or a part thereof (including reorganization, dissolution or liquidation).

## Transfer of personal data to third countries

The personal data that we collect about you may be transferred to countries different from the country in which the personal data are initially collected. These countries may not have the same legal regulations for personal data protection as the country in which you initially provide your personal data. Whenever we intend to transfer your personal data to other countries, we will protect such data in the manner as specified in this Personal Data Processing Notice, and any such transfers will comply with valid legal regulations.

The countries where we might transfer your personal data may be located:

- in the European Union
- outside the European Union

If we transfer your personal data from the European Union to countries or international organizations outside the European Union, the transfer will be subject to:

- a. a decision of the European Commission stating that this country ensures an adequate level of personal data protection;
- b. other permitted legal grounds in case of absence of such decision, either on the basis of (a) a legally binding and enforceable tool among public authorities or institutions; (b) binding corporate rules; or (c) standard data protection contractual clauses (formerly known as “model contractual clauses”) adopted by the Commission, etc.

## Your rights and options as a data subject

Whenever permitted by legal regulations, you may exercise the following rights under Articles 15 through 22 of the GDPR:

- Right of access:* You have a right of access to the personal data related to you in order to verify whether your personal data are processed in compliance with legal regulations.
- Right to rectification:* You have a right to require that the data controller should rectify any incorrect or incomplete data registered about you, in order to protect the correctness of such information and modification of the same for processing.
- Right to erasure:* You have a right to require that the data controller should erase your personal data and refrain from any further processing of these data.
- Right to restriction of processing:* You have a right to require that the data controller should restrict the processing of your personal data.
- Right to data portability:* You have a right to require portability of your data; in other words, you may receive the originally provided personal data in a structured and commonly used format or you may require that your data should be transmitted to another data controller.

- f. *Right to object*: You have a right to object at any time to the processing of your personal data on the grounds listed in the GDPR, without having to justify your decision.
- g. *Right not to be subject of automated individual decision-making*: You have a right not to be subject of a decision that is based exclusively on automated processing, including profiling, which produce legal effects on you or similarly significantly affect you.
- h. *Right to lodge a complaint with a supervisory authority*: You have a right to lodge a complaint with a supervisory authority, in particular in a member state of the European Union of your habitual residence, place of work or place of the alleged infringement if you believe that the processing of your personal data infringes the GDPR.

In all cases when the processing is based on your consent, as stipulated in Article 7 of the GDPR, you may withdraw your consent at any time.

If you need more details of the processing of your personal data, please contact us using the details provided in the section Ways to contact us.

## Updates of our Personal Data Processing Notice

This Personal Data Processing Notice (including any amendments) may be regularly updated to reflect any changes in our procedures applicable to personal data protection and updated legal regulations. You will be advised of any important changes in an eye-catching notice published on our Websites, with a note of the last update date.

## Ways to contact us

If you wish to ask any questions or raise any comments regarding this Personal Data Processing Notice or in case you want to exercise your rights, please use the following contact details:

**Adamantem HR s.r.o.**, office: Březiněveská 1853/29, Praha 8, 182 00, Czech Republic.