

INFORMATION ON PROCESSING OF PERSONAL DATA BY HUMAN IT GROUP SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ SP. K.

Respecting privacy rights, Human IT Group spółka z ograniczoną odpowiedzialnością sp. k. (hereinafter: "Administrator" or "Human IT") processes your personal data in accordance with national and European legislation.

The Administrator ensures the security of personal data, i.e. its confidentiality, availability, integrity, as well as the accountability of its activities. In order to make our processing processes transparent to you, within the framework of this privacy policy, we provide you with the most important information regarding the Administrator's processing of personal data 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/WE (General Data Protection Regulation, hereinafter: "RODO").

DATA ADMINISTRATOR

The administrator, i.e. the entity deciding on the purposes and means of the processing of your personal data, is Human IT Group spółka z ograniczoną odpowiedzialnością sp. k. with its registered office in Wrocław (address: ul. Gen. Jana Henryka Dąbrowskiego 44, 50-457 Wrocław). In matters related to the processing of your personal data, you can also contact us by e-mail at the following e-mail address: iod@humanit.group.

Human IT Group spółka z ograniczoną odpowiedzialnością sp. k. attaches particular importance to the protection of personal data and has therefore appointed a Data Protection Officer whom you can contact at the e-mail address iod@humanit.group. The controller encourages you to contact the DPO with any concerns regarding the processing of your personal data.

ACQUISITION OF DATA AND PURPOSE OF PROCESSING

Depending on your relationship with us, in carrying out our business functions we process personal data for different purposes and to different extents:

Commercial users of the Efectivo application

Purpose of processing and legal basis	Data retention period	In the case of data collection other than from you, the source of the data and the categories of personal data.
<p>for the purpose of fulfilling the contract with the Commercial User consisting of enabling the use of the application and all profile functionalities, or to take action prior to the conclusion of the contract, at the request of the Commercial User (Article 6(1)(b) RODO),</p> <p>for billing, accounting and financial reporting purposes (Article 6(1)(c) and (f) RODO),</p> <p>in order to comply with legal obligations (Article 6(1)(c) RODO),</p> <p>for the purposes indicated in the content of the consents for the processing of personal data - if such consents were given (Article 6(1)(a) RODO), in particular with regard to the publication of images of the users of the application. Please note: providing data other than that requested by the Administrator or data marked as optional is an explicit action equivalent to consent to the processing of personal data for the purposes for which they were provided.</p> <p>As well as in connection with the pursuit of the legitimate interests</p>	<p>If you enter into a contract with the Administrator, your personal data will be processed for the duration of the contract and, after the end of the contract, until the expiry of the limitation periods for claims arising therefrom.</p> <p>Personal data processed on the basis of consent or on the basis of the Administrator's legitimate interest will be retained until you withdraw your consent or object, i.e. show us in any way that you do not wish to remain in contact with us and receive information about the activities we undertake.</p> <p>Once consent has been withdrawn or an objection has been made,</p>	<p>As a rule, data is collected directly from commercial users.</p>

<p>of the controller (Article 6(1)(f) RODO):</p> <ul style="list-style-type: none"> • for the establishment, investigation and defence of claims, • to verify the age of the user in order to assess the acceptability of the use of the application, • in order to support the user and ensure the correct functioning of the application, • for statistical purposes related to improving the efficiency of the work, the quality of the services provided and adapting them to the audience. 	<p>personal data may be retained for the purpose of demonstrating the correct fulfilment of legal obligations incumbent on the Controller or until the expiry of the limitation periods for claims, whichever is the longer.</p>	
---	--	--

Users of the Efectivo application, to the extent that the data administrator is Human IT (check * below)

Purpose of processing and legal basis	Data retention period	Where data is collected other than from you, the source of the data and the categories of personal data.
<p>for the purpose of fulfilling the contract with the User to enable the use of the application and the profile functionality (Article 6(1)(b) RODO),</p> <p>for billing, accounting and financial reporting purposes (Article 6(1)(c) and (f) RODO),</p> <p>in order to comply with legal obligations (Article 6(1)(c) RODO),</p> <p>for the purposes indicated in the content of the consents for the processing of personal data - if</p>	<p>If you enter into a contract with the Administrator, your personal data will be processed for the duration of the contract and, after the end of the contract, until the expiry of the limitation periods for claims arising therefrom.</p> <p>Personal data processed on the</p>	<p>As a rule, data is collected directly from commercial users.</p>

<p>such consents were given (Article 6(1)(a) RODO), in particular with regard to the publication of images of the users of the application. Please note: providing data other than that requested by the Administrator or data marked as optional is an explicit action equivalent to consenting to the processing of personal data for the purposes for which they were provided.</p> <p>And also in connection with the pursuit of the legitimate interests of the controller (Article 6(1)(f) RODO):</p> <ul style="list-style-type: none"> • for the establishment, investigation and defence of claims, • to verify the age of the User in order to assess the acceptability of the use of the application, • in order to support the User and ensure the correct operation of the application, • for statistical purposes related to improving the efficiency of the work, the quality of the services provided and adapting them to the audience. 	<p>basis of consent or on the basis of the Administrator's legitimate interest will be retained until you withdraw your consent or object, i.e. show us in any way that you do not wish to remain in contact with us and receive information about the activities we undertake.</p> <p>Once consent has been withdrawn or an objection has been made, personal data may be retained for the purposes of demonstrating correct compliance with legal obligations incumbent on the Controller or until the expiry of the limitation periods for claims, whichever is the longer.</p>	
--	--	--

Customers and persons appointed to perform the contract

Purpose of processing and legal basis	Data retention period	Where data is collected other than from you, the source of the data and the categories of personal data.
---------------------------------------	-----------------------	--

<p>For the purpose of performing a contract with the Customer or taking pre-contractual action, at the request of the Customer, expressed in any way (Article 6(1)(b) of the DPA - if you are the Customer; Article 6(1)(f) of the DPA - if you are a person acting for or on behalf of the Customer),</p> <p>for billing, accounting and financial reporting purposes (Article 6(1)(c) and (f) of the DPA),</p> <p>in order to comply with legal obligations (Article 6(1)(c) RODO),</p> <p>And also in connection with the pursuit of the legitimate interests of the controller (Article 6(1)(f) RODO):</p> <ul style="list-style-type: none"> • for the establishment, investigation and defence of claims, • for statistical purposes related to improving the efficiency of the work, the quality of the services provided and adapting them to the audience. 	<p>Personal data will be stored until the expiry of the statute of limitations for claims arising from the contract with the customer.</p> <p>In the absence of a contract, personal data will be stored for a period of 14 days.</p>	<p>Personal data is obtained directly from the data subjects, from the customer or from a person who cooperates with us on behalf of the customer. We obtain personal data to the extent necessary for the conclusion and execution of the contract, the most common of which are: name, surname, postal address, e-mail address, telephone number, order data and invoice data.</p>
---	---	--

*** HUMAN IT IS THE CONTROLLER OF USER DATA IN TERMS OF:**

1. profile data of the user of the application, i.e. name, surname, telephone, e-mail address, login, password, profile photo,
2. data in the TO DO List,
3. the data related to the possession of e-coins balances - with regard to the possession of e-coins in the Users' account from the employer, and with regard to the transfer and storage of e-coins from other sources,
4. data relating to the affiliate programme,
5. data related to supporting the user in using the application - Help Desk activities,
6. the private data of the Users to be uploaded by the Users in the communicator,
7. Users' private data to be included in the calendar,

8. Users' private documents to be included in the application.

HUMAN IT AS PROCESSOR

- I. Human IT is the data processor and the controller is the Customer (the User's employer or collaborator) on whose behalf Human IT processes the data - in connection with the functionalities available in the application on the User's Account, used for business purposes. If such a situation occurs, you should receive information about the processing of your personal data to the relevant extent from the data controller, which will be your employer or collaborator in the case of civil law contracts.
- II. Human IT is a data processor when it processes the data of Users and Commercial Users on behalf of the Partners providing benefits within the benefits module.

RECIPIENTS OF THE DATA

In connection with its activities, the Administrator may disclose your personal data to the following entities:

- a) to state authorities or other entities entitled on the basis of regulations - if this is necessary for the fulfilment of legal obligations,
- b) entities supporting us in our operations on our behalf, in particular: providers of external ICT systems to support our operations, subcontractors, entities auditing our operations or appraisers, whereby such entities will process the data on the basis of a contract with the Controller and only in accordance with the Controller's instructions,
- c) Partners providing benefits,
- d) to entities providing accounting, personnel or legal services - to the extent necessary to ensure the fulfilment of legal obligations or to establish, assert and defend claims.

DATA PROCESSING RIGHTS

Every person whose data is processed by the Controller has the right to:

- a) access to their personal data,
- b) rectify your personal data,
- c) delete your personal data,
- d) restrict the processing of your personal data,
- e) object to the processing of your personal data (in accordance with Article 21(1) of the RODO, when submitting an objection, you must indicate the reasons related to your particular situation),
- f) portability of your personal data.

In addition, you have the right to lodge a complaint with the supervisory authority, i.e. the President of the Office for Personal Data Protection.

VOLUNTARINESS OF DATA

The provision of data in the form of name and surname, phone number, and e-mail address is necessary to enable you to create a profile and use the application. For the rest, the provision of data is voluntary.

TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

Data will be processed within the European Economic Area, i.e. as a general rule we do not transfer data to third countries.

PROCESSING OF PERSONAL DATA BY AUTOMATED MEANS

If your data will be subject to automated decision-making resulting in legal effects or similarly significant impacts, such decision-making will be made in accordance with the terms of the terms and conditions, the contract or the consent clause we request in a separate statement.