

PRIVACY POLICY

I. General provisions

1. We provide the Website Users with full respect for their privacy and protection of their personal data.
2. The administrator of data processed in the JOBSQUARE service is **JobSquare Limited Liability Company** with its registered office in Warsaw at ul. Mokotowska 1, 00-640 Warsaw, entered into the court register by the District Court for the capital city of Warsaw in Warsaw, 12th Commercial Department of the National Court Register under the number: 0000552038, Tax Identification Number: 7010476831, REGON: 361237797, with share capital in the amount of 17,550.00 PLN fully paid (hereinafter: **Administrator, Service Provider**).
3. Contact with the administrator is possible in the following way:
 - By phone at +48 531 228 805,
 - E-mail - app@jobsquare.pl
 - By post to the following address: ul. Dobra 5/5, 00-384 Warsaw.Current Administrator's contact details can be found in the "Contact" tab.

II. Definitions

The terms used in this document shall have the following meanings:

- a. User** - a natural person, a legal person, an organizational unit that is not a legal person, whose legal provisions grant legal capacity, using in any way the Application or the Website, including those who visit publicly accessible websites.
- b. Employee** - an adult natural person interested in contacting entities offering employment on the basis of an employment contract, agency contract, appointment or appointment, as well as on the basis of a civil law contract or based on self-employment.
- c. Employer** - An entrepreneur registered in CEIDG or KRS seeking employees.
- d. Work** - employment based on a contract of employment, agency agreement, appointment or appointment, as well as on the basis of a civil law contract or based on self-employment
- e. Job Offer** - information created by a Registered Employer that he is looking for Job Placement Offers by Employees. The offer contains information about the Industry, Position, place of work and Remuneration.
- f. Application** - Applicant's application named JobSquare available for Android and iOS.
- g. Website / Website** - means a website operating on the basis of the Information System, managed and made available on the Internet at: <https://www.jobsquareapp.com/>
- h. Services** - services provided to Registered Users in detail listed in Chapter III 1-5, Regulations.
- i. Personal data** - means information about an identified or identifiable natural person ("data subject"); an identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name, identification number, location data, internet identifier or one or more specific factors determining physical, physiological, genetic, psychological, the economic, cultural or social identity of a natural person;
- j. Processing** - means an operation or set of operations performed on personal data or sets of personal data in an automated or non-automated way, such as collecting, recording, organizing, organizing, storing, adapting or modifying, downloading, viewing, using, disclosing by sending, distributing or other types of sharing, matching or combining, limiting, deleting or destroying.

k. Recipient - means a natural or legal person, public body, unit or other entity to whom personal data are disclosed, regardless of whether it is a third party.

l. Consent - the data subject means a voluntary, concrete, informed and unambiguous representation of the will, which the data subject, in the form of a declaration or a clear confirmation action, allows for the processing of personal data concerning him.

m. Smartphone - a portable telephone device that combines the functions of a mobile phone and a pocket computer equipped with GPS.

n. Regulations - Requirements for the Jobsquare and Application.

o. Acceptance of Employee / Job Offers - By clicking on the specific symbol automatically assigned to the Job Offer / Employee Profile, or by moving the offer / profile on the device screen to the right, the User accepts the given Job Offer / Employee Profile.

III. The basis and principles of personal data processing

1. Personal data are processed on the Website based on the applicable law, in particular pursuant to art. 23 point 1 point 2 and point 1 of the Act of 29 August 1997 on the Protection of Personal Data. Pursuant to Article 6 paragraph 1 lit. a and b of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL. of 27 April 2016. on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC (general regulation on data protection).

2. The provision of personal data by the User is voluntary.

3. The administrator collects and processes data necessary for the recipient's purposes for which they are processed.

4. The Administrator does not transfer, sell or lend User's personal data to third parties, except for cases specified in Chapter VII or on request, authorized by law of state authorities in connection with pending proceedings.

5. Personal data is stored in a form that allows identification of the data subject for the period of using the application services (having the Profile) by the User, subject to paragraph 6 below.

6. After ceasing using the services by the user, the Administrator may process data regarding the User, if it is necessary to settle payment for the use of services., the Administrator may process data about the User, if they are necessary to settle the service and claim for payment for the use of services.

7. Personal Data is processed by the administrator in a manner ensuring it's adequate to security /and secure, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organizational measures; in particular, the Administrator provides the following technical measures to prevent the collection and modification of personal data sent electronically by unauthorized persons:

- 256-bit SSL data encryption system.

8. The administrator processes the following categories of data:

- a. Information provided by the User,
- b. Information collected automatically.

9. The Service Provider's system automatically assigns Employee Profiles to Job Offers on the terms specified in detail in Chapter VII of the Application.

IV. Data provided by the User

1. In the registration process, the employee is asked to provide the following data:

- Data required to register and receive Job Offers: name, surname, e-mail, date of birth, sex, education,
- Optional data: description, professional experience (including industry, position, period of employment), education, foreign languages, CV, photo, job sought.

2. In the registration process, an Employer who is a natural person is asked to provide the following data:

- Data necessary for registration: name, surname of the employer, company name, name and surname of the person managing the Profile, e-mail address, NIP;
- Data provided optionally: website address, telephone, Industry;
- Data necessary to create a Job Offer: Industry, place of work.

3. In the registration process, an Employer who is a legal person is asked to provide the following personal data:

- Data necessary for registration - Name and surname of a person managing the Profile;
- Data provided optionally - telephone

4. Providing data marked as "necessary for registration / creation of a Job Offer" is necessary due to the method of functioning of the ICT system ensuring the provision of electronic services and due to the Service, therefore refusing to provide the data makes it impossible to conclude a contract for the provision of Services.

5. Users using the chat functionality provide the Administrator with the content of their chat rooms. The content of chats is encrypted and automatically saved in the System in encrypted form. The service provider does not read the contents of the chat.

6. Users contacting customer service transfer the content of this communication to the Administrator.

V. Data Collected Automatically

1. By installing the Application on a Smartphone, the User authorizes the administrator to access the following data collected in the Smartphone: calendar, location, photos, shopping, identity. The provision of this data is necessary due to the method of functioning of the ICT system ensuring the provision of electronic services and due to the Service's characteristic, therefore refusal to provide data prevents installation of the Application and conclusion of the Services Agreement.

2. The User may register in the Application via his login on Facebook - in this case, the User authorizes the Administrator to access some of the information on his Facebook account, i.e. profile picture, e-mail, age (such as public profile on Facebook compatible with privacy settings on

Facebook), e-mail address, interests, likes, sex, birthdays, education history, current City, photos, personal description, list of friends.

3. The User may register in the Application via his Google+ login - in this case, he authorizes the Administrator to access some information on the Google + profile, i.e. e-mail address, first and last name, and photo

4. While using the Application on the mobile device or website, Administrator collects information from the User's browser. The information collected includes: IP address, device identifier and type, browser type and language, operating system used by the device, access times, geographical location of the mobile device used, as well as the website address of the referring webpage.

5. The service provider may, pursuant to art. 18 para. 5 of the Act of 18 July 2002 on the provision of electronic services, process data characterizing the User's use of the Services (so-called operational data), i.e.

- markings identifying the User on the basis of the information provided by him,
- markings identifying the end of the telecommunications network or IT system,
- information on the beginning, ending and scope of each use of the service,
- information about the usage of services provided electronically.

We reserve that we provide information about the data provided by the User and about the data referred to above to the state authorities for the purposes of proceedings conducted by them

6. The Jobsquare website uses the so-called cookies (cookies). These files are saved on the User's computer by the application server and provide statistical data about the User's activity, in order to select our offer for his individual needs and tastes. The user may at any time disable the option of accepting cookies in his web browser, although he must be aware that in some cases, disconnecting these files may affect the application's disadvantage. Cookies are used to following purpose:

- adjusting the content of the Website pages to the User's preferences and optimizing the use of websites; in particular, these files allow to recognize the device of the Website User and properly display the website, tailored to his individual needs;
- creating statistics that help to understand how the Service Users use websites, which allows improving their structure and content;
- maintaining the Website User's session (after logging in), thanks to which the User does not have to re-enter his login and password on every subpage of the Website;

VI. The scope of personal data processing

1. The Administrator processes personal data to the extent necessary for the correct implementation of services provided electronically, i.e. .:

- a. To create a database of Employers, a database of Employees and a database of Job Offers;
- b. To enable contact between Automatically Assigned Employees and Employers via online chat, e-mail;

- c. To manage Users' profiles and to provide them with support in the process of using the Services and Applications;
- d. In order to provide the Service Provider with information on the technical nature and other data related to the functioning of the Website, to the e-mail address provided in the Profile;
- e. In order to make settlements related to services rendered, including issuing VAT invoices;
- f. In order to examine the market and the behavior and preferences of the Recipients with the purpose of the results of these tests for the purpose of improving the quality of services provided by the Service Provider.
- g. The administrator makes the data available to other Registered Users and third parties on the terms described in chapter VII below.

VII. Providing personal data to third parties

1. Data of Employers and Employees are not available to all Registered Users of the Application, only those who have been Automatically Assigned to the System.
2. The administrator provides personal data of Employees to Employers by displaying Automatically Assigned Employers on the following principles:
 - a. If the Employee Profile is automatically assigned to the Employer's Job Offer, this Employer sees a simplified Employee Profile containing the following information: name, surname, gender, age, rate, professional experience
 - b. If the Employee makes an Acceptance of an Automatic Assigned Job Offer, the Employer will have access to the following personal data:
 - contact details of the Employee,
 - career paths,
 - information about education,
 - knowledge of foreign languages,
 - personal data contained in the CV placed by the Employee.
3. The Employer is entitled to use the Employee Personal data only for recruitment to the job position presented in the Job Offer, to which the System Automatically Assigned the Employee Profile. Without separate consent of the Employee, it is forbidden to use the Employee's personal data for purposes other than those indicated in the preceding sentence, in particular, it is prohibited to share Employee's personal data with third parties, creating a database of employees for other recruitments.
4. An employer who has marked his offer as anonymous or did not disclose his name or address in the Job Offer is obliged to inform the Employee about his full name and address before processing his Employee's personal data.

5. If the Employee's personal data becomes available to the Employer, the Employer becomes the administrator of Employee's personal data on the terms set out in sections 2-3 above and is responsible for its processing in accordance with the law.

6. The Administrator provides personal data of Employers who are natural persons to Employees Automatically Assigned to the Employer's Job Offer, on the following principles:

- If the Job Offer is Automatically Assigned to the Employee, the Employee will see an overview of the Job Offer containing the following data: employer name, job location, industry, position, rate, Employer's phone number (if the employer has made this information available to Employees), Employers website address (if the employer has made this information available to Employees)

7. The employee is entitled to process the Employer's personal data only for the purpose of submitting to the Employer an offer of employment for the position presented in the Job Offer, to which the System Automatically Assigned the Employee Profile, establishing contact to determine the Working Conditions. Without a separate consent of the Employer, it is forbidden to use the Employer's personal data for purposes other than those indicated in the previous sentence, in particular, it is prohibited to share Employer's personal data with third parties, creating a database of Employers for other recruitments.

8. In the case of sharing Employers personal data to the Employee, in accordance with the principles set out in items 5-6 above, the Employee becomes the administrator of Employee's personal data and is responsible for its processing in accordance with the law.

9. The Administrator provides data to external recruiters in order to carry out recruitment processes and present Job Offers or Employees. In this case, the External Recruiter is also the administrator of personal data, which is responsible for its processing in accordance with the law. The External Recruiter is obliged to immediately inform the person about the data obtained; your name and address, the purpose of data processing, the categories of personal data being processed, the recipients or categories of recipients to whom the personal data will be disclosed, the planned period of personal data storage and consent to data processing.

10. The Administrator reserves the right to transfer his personal data in case of sale or transfer, in whole or in part, of a company or property including the transfer of rights to the Website or Application.

11. If the rights to the Application or Service are transferred to a third party, that person will become the administrator of the personal data of Registered Users, he will be entitled to process data only to the extent and purposes of consent granted by the user and this Privacy Policy

12. After the sale or transfer, Users may address the entity for which we have transferred personal data with questions regarding the processing of this data.

13. The personal data of the Service Recipients may be used by the Service Provider for the purpose of sending commercial information coming from the Service Provider or third parties electronically only after the Customer expressly consents to such use.

VIII. Information and access to personal data

1. Each person has the right to control the data process related to him by the Service Provider; in particular the right to:

- Withdrawal of consent to the processing of personal data. The withdrawal does not affect the lawfulness of the processing which was made on the basis of the consent prior to its withdrawal. In the event of withdrawal of consent for the processing of personal data marked as "necessary for registration / creation of a Job Offer", the Service Provider has no technical means to continue providing the Services and is entitled to terminate the contract in accordance with Chapter XI, point 10 of the Regulations.
- Obtaining information about the purpose, scope and method of data processing.
- Obtaining information as to when the data concerning it is processed and providing the information in a generally comprehensible form.
- Obtaining information about the source from which data concerning it originated.
- Obtaining information on the method of data sharing, in particular information on the recipients or categories of recipients to whom these data are made available.
- Requests to supplement, update, rectify personal data, temporarily or permanently suspend processing, or remove them if they are incomplete, out-of-date, untrue or have been collected in violation of the Act or are no longer necessary to achieve the purpose for which they were collected.
- Submit a written, motivated request to cease processing of its data due to its special situation.
- To object to the processing of its data for marketing purposes or to transfer its personal data to another data controller.

2. The data subject has the right to access his personal data at any time.

3. The data subject is entitled to obtain from the administrator confirmation whether personal data concerning him is being processed and, if so, he is entitled to access to them and the following information about the purpose of processing, categories of personal data being processed, about recipients or categories of recipients to whom personal data have been or will be disclosed about the planned period of storage of personal data.

4. The data subject has the right to require the administrator to immediately correct personal data that is incorrect about him / her. Taking into account the purposes of processing, the data subject has the right to request supplementing incomplete personal data; including by providing an additional statement.

5. The data subject has the right to request the administrator to delete his personal data immediately, and the administrator has the obligation to delete personal data without any delay, if:

- personal data are no longer necessary for the purposes for which they were collected or otherwise processed,
- the user withdraw from the consent on which the data processing is based,
- the personal data were processed unlawfully,

- personal data must be removed in order to comply with the legal obligation.

If the administrator has publicized the personal data that he is required to delete, he takes reasonable steps, including technical measures, to inform the administrators processing this personal data that the data subject requests that the administrators should delete any links to these data, a copy of their personal data or any replications of it.

6. The data subject has the right to request the administrator to restrict processing in the following cases:

- questions the accuracy of personal data - for a period allowing the administrator to check the correctness of this data;
- the processing is unlawful and the data subject opposes the removal of personal data, requesting instead to limit their use;
- the administrator no longer needs personal data for processing, but it is needed by the data subject to establish an investigation or defend his claims;

7. A person whose data is processed for the purpose of direct marketing has the right to object at any time to the processing of his personal data for such marketing purposes, including profiling, to the extent that the processing is related to such direct marketing.

8. The data subject has the right to receive, in a understandable and a commonly used machine-readable format of personal data about him that he has provided to the administrator and has the right to forward this personal data to another administrator without any interference from the administrator to whom this personal data was provided .

IX. Final Provisions

1. The Privacy Policy shall enter into force on January 22, 2018.

2. The Service Provider is entitled to change the provisions of the Privacy Policy for important reasons only for which it is recognized:

- a. extension or modification of the functionality of the Application or the Website,
- b. introducing new services or changing the scope of services, particularly introducing payments for some or all services,
- c. changes in technical requirements necessary for the operation of the Application or the Website, in particular regarding the end-user's devices and IT system, changes in the technical conditions for the provision of services also the occurrence of new risks related to the provision of electronic services,
- d. the need to amend the Privacy Policy of a technical nature that does not affect the content of the rights and obligations of the Parties, in particular to remove mistakes and errors as well as to change references,
- e. the need to adapt the Privacy Policy that applies to a certain law obligation , in particular in the field of services provided,

f. the need to adapt the services or content of the Privacy Policy to court decisions and administrative decisions,

g. adaptation of the Privacy Policy to the best practices of providing services and user protection,

h. changes in the data of the Service Provider disclosed in the Privacy Policy, in particular contact details.

3. The Service Provider informs about the change of the Privacy Policy by:

- a message visible by the User after logging in his profile on which information about changing the Privacy Policy is displayed together with the link to the content of the new Privacy Policy or the content of the changes made,
- placing information on the change of the Privacy Policy on the Website,
- sending Registered Users information concerning changing the Privacy Policy along with the uniform text of the Privacy Policy mail to the e-mail address provided in the registration process.

4. Any questions, applications and suggestions relating to the protection of your privacy, and personal data in particular, please report by mail to the e-mail address of the Service Provider indicated in Chapter I paragraph 3 or in writing to the Service Provider's address indicated in Chapter I section 3.

5. We would like to point out that if in the application or on the website, we place links leading to other websites not administrated by us, we cannot be responsible for the content of these websites or for the degree of privacy protection provided by administrators of these websites. When making a decision about switching to such websites, the User agrees to it at his own risk.

Our site may, from time-to-time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy and cookie policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.