



## PRIVACY POLICY IN RECRUITMENT

### Information on the processing of personal data of candidates applying for admission to the Akademeia High School or Akademeia Prep School and their parents (legal guardians)

#### I. Information on your personal data administrator:

The administrator of your personal data is Akademeia High School spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw at ul. St. Urszula Ledóchowska 2, 02-972 Warsaw, entered into the Register of Entrepreneurs run by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register, under numbers: KRS 0000638796, REGON 365509117, NIP 7010618739, being the governing body of the Akademeia High School (further on referred to as the "School") and Akademeia Prep School (further on referred to as the "Institution").

You can contact us in person or by correspondence at any time at the address stated above, by email at [office@akademeia.edu.pl](mailto:office@akademeia.edu.pl) or by calling +48 22 299 87 87.

#### II. What is the purpose of using your personal data:

The personal data of the candidate, and in the case of underage candidates, also personal data of the candidate's parents (legal guardians), are availed by us:

1. for the purposes of conducting the recruitment process for the School or Institution as you may choose, and for contacting you.

*-legal basis: Article 6 (1) (b) of the GDPR in the case of data the submission of which is necessary for candidate participation in the recruitment process and Article 6 (1) (a) of the GDPR, the so-called 'consent' in the case of data the application of which is not necessary for candidate participation in the recruitment process.'*

2. for compliance with the legal obligations imposed on us. In particular, for ensuring the safety of candidates, issuing and storing invoices and accounting documents, or meeting tax obligations.

*- legal basis: art.6 sect.1 lit. c GDPR.*

3. for the purposes in connection with our legally justified interests and interests of our partners, and in particular, in order to:

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<sup>1</sup> Whether or not provision of specific personal data is necessary for candidate participation in the recruitment process is indicated each time in each of the fields of the recruitment form. Data that must be provided for participation in the recruitment process is marked with an asterisk (\*).



- a. provide reliable operation and high-quality services so that you may be, among others, regularly informed on the status of the processes and applications that concern you;
- b. prevent instances of fraud, i.a. by identifying you and any persons contacting the School or Institution with recourse to personal data;
- c. facilitate direct marketing;
- d. facilitate internal administrative purposes implemented within the group of enterprises;
- e. ensure network and information security, for example by ensuring that the information system is resistant to incidental adverse circumstances and to unlawful or unfriendly activities that violate the availability, authenticity, integrity and confidentiality of personal data stored or transmitted;
- f. ensure the security of services provided or made available by information networks and systems, for example, by preventing unauthorised access to electronic communications networks;
- g. analyse data, i.a. for the purposes of enhancing the services provided.

- *legal basis: art.6 sect.1 lit. f GDPR.*

4. for other purposes, conditional upon your consent.

- *legal basis: art.6 sect.1 lit. a GDPR.*

### III. Which of your personal data we process and how:

1. In order to enable candidate participation in the School or Institution recruitment process, you are asked to voluntarily fill out the recruitment form. You provide us with your personal data, i.e. the personal data of the candidate and at least of one of the parents (legal guardians) of the candidate. In case of candidate, this includes: name and surname, date of birth, citizenship, information about the school or institution which the candidate is currently attending, and subjects studied during last year, information on recent examinations and results of these examinations, information on candidate interests and predispositions, information on foreign language skills and information on the candidate aspirations (plans for the future). Accordingly, in the case of the candidate parent, this information includes: name and surname, phone number, e-mail address, or also a correspondence address if you want to receive the results of recruitment by traditional mail. Due to there being a need for confirming correct qualification of candidate to appropriate class, you are also asked to provide a copy of school certificate for last school year or other equivalent document. Of course, you do not have to provide us with this data. However, if you fail to do so, the candidate for the school or institution will not be able to participate in the recruitment process.
2. To ensure high level of services rendered and meet your expectations, we also provide you with the opportunity of submitting other information, such as phone number and e-mail address of candidate - to improve contact between us; information about schools or institutions to which the candidate has attended in the past, information about any extracurricular interests of candidate, completed courses, internships, apprenticeships or volunteering activity - in order to get to know the candidate better



and to match examination subjects to his skills precisely. To confirm the information provided, we enable you to attach any relevant supporting documents. In addition, we provide the opportunity for both the candidate and the parents (guardians) of the candidate to freely comment on the candidate - in order to facilitate you in providing us with any other relevant information that may be relevant in the recruitment process. Of course, you do not have to provide us with this data. Failure to provide them may, however, result in imprecise matching of the exam subjects to the candidate skills.

3. While aiming to offer even recruitment chances to candidates with dyslexia, dysgraphia or to those struggling with some other learning difficulties, we also encourage you to provide us with information in this respect. Of course, you do not have to provide us with this data. However, if you fail to do so, the candidate will not receive any additional support during the examinations, e.g. in terms of additional time for answering a question.
4. If you will decide to submit an application for participation in the recruitment process via the electronic form available on our website, we will also collect information on date and time of the documents sent and IP of the device from which such application was dispatched.
5. During the recruitment process, we may also come in possession of some other of your data, such as your bank account number and data of your bank or payment institution, if you decide to pay us through their intermediary.

IV. Who we can share your personal data with:

We can share your personal data with:

1. Entities processing personal data on our behalf, and in particular:
  - a. our subcontractors, inclusive of teachers and non-pedagogical workers;
  - b. entities rendering their services to us or else those providing IT systems;
  - c. entities conducting postal or courier activities that are not postal operators;
  - d. entities providing accounting and consulting services to us, including legal services.
2. Other administrators of personal data acting in their own name, and in particular:
  - a. postal operators;
  - b. banks and payment institutions;
  - c. our partners, i.e. such as entities being part of the group;
  - d. insurance company of our choice.

- V. We refrain from transferring your personal data to countries and organisations outside the European Economic Area.

VI. How long and on the basis of what criteria will we process your personal data:

If we process your personal data on the basis of your consent for marketing purposes, we will do so until such consent is withdrawn.

If we process your personal data on the basis of your consent, for purposes other than marketing, and in particular for recruitment purposes, we will do so no longer than until you withdraw such consent, and not any later than until 31 August following the day of termination



of the recruitment process in the case of candidates admitted to the School or Institution, or else not any longer than for a period of three months from the date of termination of the recruitment process in the case of candidates not admitted to the School or Institution. In that same period, we will process your personal data pursuant to art. 6 sect 1 lit. b and c of GDPR.

Then, after restricting the scope of processed personal data to the data which may be necessary to fulfill our legal obligations, the data will be processed within the time period, as specified in the generally applicable provisions of law or in accordance with the criteria set out therein.

(For instance, we are obliged to keep your personal data obtained during the recruitment process to the extent enabling settlements for the services provided, for a period of 5 years, commencing from the beginning of the year following the year to which the settlements relate. *Legal basis: Article 74 of the Accountancy Act of September 29, 1994*)

During the same period, your personal data will be processed for the purposes of pursuing our legitimate interests and the legitimate interests of our partners, provided you do not object to this. Likewise, when there are valid, legitimate grounds for data processing that override your interests, rights and freedoms, or grounds for establishing, pursuing or defending relevant claims.

VII. What rights do you have and how to implement them:

1. We will provide you with confirmation whether we are processing your personal data and we will provide you access to it at your request, and we will also rectify incorrect data or supplement incomplete data.
2. In circumstances specified in the personal data protection law and to the extent indicated therein, we will also exercise your rights to:
  - a. delete your personal data;
  - b. restrict processing of personal data;
  - c. transfer personal data;
  - d. object to processing of personal data.
3. If the processing of personal data is based on your consent, you can withdraw this consent at any time.
4. If you are interested in implementing any of the above rights, please contact us.

VIII. The right to lodge a complaint to supervisory authority:

We are making every effort to ensure that the processing of your personal data is carried out in accordance with the law. However, if you come to believe that we have committed a violation, you have the right to lodge a complaint to the supervisory authority, i.e. the President of the Office for Personal Data Protection.

IX. Supplementary information:

By "GDPR" we understand the 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



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of personal data and on the free movement of such data in force in Poland from May 25, 2018. and repealing Directive 95/46/EC (the so-called General Data Protection Regulation).