

INFORMATION ON THE PROCESSING OF PERSONAL DATA IN CONNECTION WITH RECRUITMENT

1. The processor of your personal data in connection with the performance of service provision agreement is Akademeia High School Sp. z o.o. having its registered seat in Warszawa, Poland, ul. Urszuli Ledóchowskiej 2, 02-972 Warszawa, Poland (hereinafter referred to as "we").
2. You can contact us by post (address provided above), by e-mail: gdpr@akademeia.edu.pl or by telephone: +48 22 299 87 87.
3. We process your personal data for the following purposes:
 - a. to take actions necessary to conclude the contract at your request and carry out the recruitment process, among others: by assessing your qualifications (art. 6 para. 1.b of the GDPR);
 - b. fulfilment of our legal obligations set out in Labour Code and connected with recruitment process (art. 6 para. 1.c of the GDPR);
 - c. if you provide data other than those required by law – based on your consent, in order to carry out the recruitment process (art. 6 para. 1.a of the GDPR) and in the event of providing special category data also art. 9 para. 2.a of the GDPR;
 - d. to implement our legitimate interest consisting in determining, investigating or defending against claims (art. 6 para. 1. f of the GDPR) and in the event of providing special category data also art. 9 para. 2.f of the GDPR;
 - e. in the event of additional consent – for the purposes of taking into account in future recruitments (art. 6 para. 1.a of the GDPR);
 - f. in the event of additional consent – to contact persons indicated by the candidate as providing references (art. 6 para. 1.a of the GDPR);
 - g. internal administrative purposes of the capital group to which we belong, and as part of this your personal data will be transferred to our parent company, i.e. ISP Poland Limited having its registered seat in London, UK (Companies House registration number: 14447116), which constitutes our legitimate interest (art. 6 para. 1. f of the GDPR).
4. The recipients of your personal data will be:
 - a) companies providing IT services or solutions;
 - b) persons providing references indicated by the candidate (in the case of contact with a request for recommendations);
 - c) medical facilities conducting medicine research;
 - d) our parent company, i.e. ISP Poland Limited having its registered seat in London, UK.
5. As our parent company ISP Poland Limited has its registered seat in London, UK, your personal data will be transferred outside the European Economic Area ("EEA") – to UK based on article 45 of the GDPR, i.e. on the basis of the European Commission's decision on the adequacy of the level of personal data protection in this country¹.

¹ Commission Decision (EU) issued pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council, declaring the adequacy of personal data protection by the



In addition, some of our IT solution providers process your data in the USA. In order to use their services, we must provide them with personal data. We transfer personal data to these entities on the basis of the European Commission's decision on the adequacy of the level of data protection². These are only US-based companies that participate in the Data Privacy Framework. More information can be found at <https://www.dataprivacyframework.gov/s/>.

6. We store your personal data for 3 months and if you consent to participate in future recruitment – for 12 months from the end of the recruitment process. In the event of reasonable information about the possibility of claims - also for the period resulting from the limitation period for claims, accounting or other rights in this regard.
7. In connection with our processing of personal data, you have certain rights:
 - a. The right to information about what personal data concerning you are processed by us and to receive a copy of this data (the so-called right of access). Issuing the first copy of the data is free of charge, we may charge a fee for subsequent copies;
 - b. If the processed data becomes outdated or incomplete (or otherwise incorrect), you have the right to request its rectification;
 - c. In certain situations, you may ask us to delete your personal data, i.e. when we no longer need the data for the purposes we informed you about; when you effectively withdraw your consent (unless we have the right to process data on another legal basis) if the processing would be unlawful; or if the need to delete results from our legal obligation;
 - d. If personal data is processed by us on the basis of consent to processing or in order to perform a contract concluded with us, you have the right to transfer your data to another controller;
 - e. If we process personal data on the basis of a legitimate interest, you have the right to object to the processing of such personal data;
 - f. If you consider that the personal data being processed is incorrect, the processing is unlawful, or we no longer need certain data, or if you object to the processing, you may also request that we, for a specific period of time, (e.g. checking the correctness of data or pursuing claims) did not perform any operations on the data, but only stored it
 - g. If we process your personal data on the basis of your consent – you can withdraw it in any time, without any effect for the lawfulness of the processing before the withdrawal.
8. You have the right to lodge a complaint to the President of the Data Protection Office if you consider that the processing of your personal data violates the provisions of the General Data Protection Regulation (GDPR).
9. Providing your personal data is necessary to perform the contract referred to in point 3 above.
10. Your personal data will not be the basis for making automated decisions, including profiling

United Kingdom; Commission Decision (EU) 2021/1773 issued pursuant to Directive (EU) 2016/680 of the European Parliament and of the Council, declaring an adequate level of protection of personal data by the United Kingdom.

² Commission Implementing Decision (EU) 2023/1795 of 10 July 2023 based on Regulation (EU) 2016/679 of the European Parliament and of the Council, declaring the adequacy of personal data protection ensured under the EU-US data privacy framework.