

## PRIVACY POLICY ON THE Exact x Forestall WEBSITE

<https://exactforestall.com/>

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## **I. INTRODUCTION**

This Privacy Policy applies to the processing and protection of Users' Personal Data in connection with their use of the Exact x Forestall Website, available at <https://exactforestall.com/>.

The Controller respects the right to privacy of the Service Users. Especially taking care of Personal Data protection, and applies proper organisational and technical measures preventing interference with Users' privacy by third parties. Activities of the Controller are focused on providing the User with the sense of security at the level stipulated for in the applicable laws.

Personal data processing takes place in accordance with the principles specified in:

- a) 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/EC and other provisions of European Union law;
- b) the national legislation of the Controller

Logging to and use of the Service means that the User accepts terms and conditions of this Policy and confirms that the User has read them. The Website can also contain links referring to other websites. They will open in a new window or the same browser window. The Controller shall not be held liable for the content in those websites. As this Privacy Policy applies only to the Exact x Forestall Website, available at <https://exactforestall.com/>, the User shall be obliged to read the privacy policy or the regulations on the website reached by the User through the reference link.

## **II. USER'S PERSONAL DATA**

### **1. Who is Personal Data Controller of the User?**

The Controller of the Personal Data collected and processed in the case of using the Service is Exact Forestall Sp. z o.o., with registered office in Częstochowa, Aleja NMP 49/12, 42-217 Częstochowa, registered in the National Court Register in the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the KRS number: 0000729296, REGON: 380045465 NIP 5272849887, with the share capital of PLN 100 050,00.

### **2. What principles does the Controller apply while processing Personal Data?**

- 2.1. On account of business activity conducted, the Controller processes Personal Data in accordance with the applicable domestic laws and European Union laws, especially GDPR.
- 2.2. The Controller shall ensure transparency of Personal Data processing, and shall always inform about processing of such data at the moment of collecting them, including the purpose and legal basis for further processing.

- 2.3. The Controller is particular about all Personal Data to be collected only in the necessary scope for the specific purpose and processed only for a necessary period.
- 2.4. Processing Personal Data, the Controller shall ensure their safety and confidentiality, and access to the information about Personal Data processing to the Users. If despite applied security measures Personal Data breach took place (e.g. "leakage" or loss of data), the Controller shall inform data subjects about such event in compliance with the law.
- 2.5. In order to ensure integrity and confidentiality of Personal Data, the Controller have implemented procedures that enable access to Personal Data only to the authorised persons and only in the scope that is necessary with respect to the tasks they perform.
- 2.6. The Controller shall apply organisational and technical solutions in order to ensure that all operations related to Personal Data shall be registered and made only by the authorised persons.
- 2.7. The Controller shall make all necessary efforts to make sure that their subcontractors and other cooperating entities provide a warranty of exercising of appropriate security measures whenever they are processing Personal Data on behalf of the Controller.
- 2.8. The Controller conducts a risk analysis on a regular basis and monitors adequacy of the applied securities concerning Personal Data to identifiable threats. If necessary, the Controller shall implement additional measures to increase data safety.

### 3. What Personal Data does the Controller process, for what purpose and on what basis? Is provision of Personal Data mandatory for the User?

Depending on the type of services provided on the Website, the Controller processes the following Personal Data of Website Users:

Purpose	Categories of data	Legal basis	Collecting user data	Is provision of Personal Data mandatory for the User?
<p>For the performance of the services of the Website, we process personal data exclusively for the following purposes:</p> <ul style="list-style-type: none"> <li>• calling up the Website,</li> <li>• ensuring seamless connection,</li> <li>• ensuring and optimising the performance of the Website and its user-friendliness,</li> <li>• ensuring and assessing the</li> </ul>	<ul style="list-style-type: none"> <li>• Hostname;</li> <li>• type of the browser;</li> <li>• type of the operating system;</li> <li>• access time;</li> <li>• addresses of websites visited in the Website;</li> <li>• address of the website from which the User went to the Website;</li> <li>• Other User's identifiers;</li> </ul>	<p>Data processing is based on the following legal bases:</p> <p>article 6 (1) (b) GDPR - conclusion, performance of the contract with the User,</p> <p>article 6 (1) (a) GDPR - user consent.</p>	<p>We collect data directly from the User.</p>	<p>The provision of the personal data indicated is voluntary, but to the extent that it is necessary for the performance of the contract – it is necessary for the use of the services offered by the Website.</p> <p>User activity on the Website, including their personal data, is recorded in system logs (a special computer program used for storage of chronological record</p>

<p>security and stability of the system.</p>				<p>of events and actions concerning the IT system used by the Controller to render services). The information about visited websites and the use of the Website and services available as part of the Website shall also be provided by cookie files. All these tools have impact on the Website being user-friendly. Therefore, failure to provide them may have impact on the convenience of use of the Website, prevent its use or make it impossible to display some information for the User.</p>
<p>For the Spontaneous Recruitment service, we process personal data in order to present you with the job offers available in our database.</p>	<p>For the Spontaneous Recruitment service, we process all information provided voluntarily and of the User's own free will, which will be necessary to resolve the case initiated by the User, in particular, this data may be:</p> <ul style="list-style-type: none"> <li>• identifying information such as name, surname,</li> <li>• contact details such as telephone number, e-mail address;</li> <li>• geolocation data.</li> </ul>	<p>Data processing is based on the following legal bases:</p> <p>article 6 (1) (b) GDPR - conclusion, performance or termination of a contract with the User</p> <p>article 6 (1) (c) GDPR - compliance with legal obligations under employment law.</p> <p>We only process data belonging to special categories on the basis of your</p>	<p>We collect data directly from the User.</p>	<p>The provision of personal data for marketing purposes is voluntary. Failure to provide Personal Data will result in inability to use the Spontaneous Recruitment service.</p>

		<p>explicit consent in accordance with Article 9 (2) (a) GDPR and to the extent that we are obliged to do so due to employment law.</p> <p>In such cases, the processing of your data takes place on the basis of Article 9 (2) (b), (g) GDPR.</p>		
<p>For the application form service, we process personal data in order to enable the User to apply for job offers posted on the Website and to carry out the recruitment process with him/her in order to establish an employment relationship with him/her or to conclude a civil law contract.</p>	<p>For the application form service, we process information provided voluntarily and of the User's own free will, which will be necessary for the recruitment process initiated by the User, in particular data:</p> <ul style="list-style-type: none"> <li>• identifying information such as name, surname,</li> <li>• contact details, such as telephone number,</li> <li>• data on preferred location.</li> </ul>	<p>Data processing is based on the following legal bases:</p> <p>article 6 (1) (b) GDPR - conclusion, performance or termination of a contract with the User</p> <p>article 6 (1) (a) GDPR - User consent.</p> <p>article 6 (1) (c) GDPR - compliance with legal obligations under employment law.</p> <p>We only process data belonging to special categories on the basis of the User's explicit consent in accordance with Article 9 (2) (a) GDPR.</p>	<p>We collect data directly from the User.</p>	<p>The provision of personal data is voluntary. Failure to provide personal data will result in inability to use the application form service.</p>

<p>For the application form service with the CV function, we process personal data in order to enable the User to apply for jobs posted on the Website and to carry out the recruitment process with him/her in order to establish an employment relationship with him/her or to conclude a civil law contract.</p>	<p>For the application form service including the CV function, we process information provided voluntarily and of the User's own free will, which will be necessary for the recruitment process initiated by the User, in particular data:</p> <ul style="list-style-type: none"> <li>• name and surname, company name and address,</li> <li>• phone number</li> <li>• e-mail address,</li> <li>• information contained in the CV,</li> <li>• information about the educational path,</li> <li>• professional experience</li> <li>• nationality,</li> <li>• residence and work permit,</li> <li>• photos:</li> <li>• foreign languages,</li> <li>• data on preferred location,</li> <li>• any other information that the User may provide to us.</li> </ul> <p>In some cases, specific categories of data, such as:</p> <ul style="list-style-type: none"> <li>• disability,</li> <li>• information about health,</li> </ul>	<p>Data processing is based on the following legal bases:</p> <p>article 6 (1) (b) GDPR - conclusion, performance or termination of a contract with the User</p> <p>article 6 (1) (a) GDPR - User consent.</p> <p>article 6 (1) (c) GDPR - compliance with legal obligations under employment law.</p> <p>We only process data belonging to special categories on the basis of the User's explicit consent in accordance with Article 9 (2) (a) GDPR</p>	<p>We collect data directly from the User.</p>	<p>The provision of personal data is voluntary. Failure to provide personal data will result in inability to use the application form service.</p>
<p>For the contact form service, including the Time to act contact form service, we process the User's data in order to answer questions about our offer and the services we provide. In this context, we process your personal data that you provide to us by contacting us and submitting an enquiry.</p>	<p>In this context, we may process the following data:</p> <ul style="list-style-type: none"> <li>• company name,</li> <li>• name and surname:</li> <li>• contact details of contact persons,</li> <li>• phone number</li> <li>• email address,</li> <li>• overview of services provided,</li> <li>• any other information that the User may provide to us.</li> </ul>	<p>Data processing is based on the following legal bases:</p> <p>article 6 (1) (a) GDPR - User consent.</p> <p>the necessity of the processing to take steps at the request of the data subject prior to entering into a</p>	<p>We collect data directly from the User.</p>	<p>The provision of personal data is voluntary. Failure to provide Personal Data will result in the inability to use the contact form service, including the Time to act contact form service.</p>

		contract (Article 6(1)(b) GDPR)		
For the sponsor application form service, we process the User's data in order to enable the User to become a sponsor and enter into a sponsorship agreement, including an agreement under the xFuture scholarship program.	In this context, we process the following data: <ul style="list-style-type: none"> <li>• company name,</li> <li>• name and surname, company name and address,</li> <li>• contact details of contact persons,</li> <li>• phone number</li> <li>• email address,</li> <li>• any other information that the User may provide to us.</li> </ul>	Data processing is based on the following legal bases  article 6 (1) (b) GDPR - conclusion, performance or termination of a contract with the User  article 6 (1) (a) GDPR - User consent.	We collect data directly from the User.	The provision of personal data is voluntary. Failure to provide Personal Data will result in inability to use the sponsor's application form service.
For the scholarship application form service, we process the User's data in order to enable the User to participate in the scholarship program and to conclude a scholarship agreement under the xFuture scholarship program.	In this context, we process the following data: <ul style="list-style-type: none"> <li>• fist and last name, address</li> <li>• date of birth:</li> <li>• phone number</li> <li>• e-mail address,</li> <li>• information about the educational pathway, examination results,</li> <li>• education,</li> <li>• professional experience</li> <li>• foreign languages,</li> <li>• data on preferred location,</li> <li>• any other information or documents which the User may provide to us</li> </ul>	Data processing is based on the following legal bases  article 6 (1) (b) GDPR - conclusion, performance or termination of a contract with the User  article 6 (1) (a) GDPR - User consent.	We collect data directly from the User.	The provision of personal data is voluntary. Failure to provide Personal Data will result in inability to use the scholarship form service.

For the Newsletter service, we process the User's data in order to send electronic letters through which we inform about events, services, products and other relevant items from our point of view.	In this context, we process the following data: <ul style="list-style-type: none"> <li>• email address.</li> </ul>	Data processing is based on the following legal bases: <p>article 6 (1) (b) GDPR - conclusion, performance or termination of a contract with the User</p>	We collect data directly from the User.	The provision of personal data is voluntary. Failure to provide Personal Data will result in inability to use the Newsletter service.
On a case-by-case basis, we also process the User's data for the purpose of investigating and defending against legal claims.	In this context, we process the following data: <p>company name, name and surname, company name and address, contact details of contact persons, phone number overview of services provided, contractual and accounting data. Other data required for defence and redress</p>	Data processing is based on the following legal bases: <p>article 6 (1) (f) GDPR and Article 9 (2) (f) GDPR - our legitimate interest in defending against legal claims.</p>	We collect data directly from the User.	The data has been voluntarily provided by the User at earlier stages of using the Controller's services.

#### 4. How long are Personal Data stored?

4.1. The period of Personal Data storage by the Controller depends on the type of services rendered and the purpose of processing.

- a) Personal Data shall be stored for the period necessary for the purposes of the processing indicated in point 3 above;
- b) to perform the contract(s) - until its termination or expiry;
- c) to establish, assert or defend against claims - until the statute of limitations has expired;
- d) to comply with existing legal obligations - until the expiry of legal obligations;
- e) in the case of Personal Data processed on the basis of consent, the Personal Data will be stored until the consent is withdrawn or an objection is lodged, whichever occurs first.

4.2. After the expiry of the processing period Personal Data are erased or anonymised.

## 5. Recipients of Personal Data

- 5.1. Users' Personal Data can be made available to entities rendering services upon the order and on behalf of the Controller, e.g. to handle the Website and available Services, especially in the scope of IT services, marketing services, analytical services, archiving, professional advisors. The Controller shall make such data available on the basis of personal data processing agreement or other legal instrument in accordance with art. 28 of GDPR, which shall ensure proper protection of Personal Data.
- 5.2. In each of the aforementioned situations Personal Data can be made available only in the event of a material legal basis (e.g. consent, e.g. in case of marketing, agreement or legitimate interest).
- 5.3. Providing Personal Data on the basis of the processing agreement referred to in par. 5.1. above, the Controller shall oblige third parties to observe securities and procedures connected with Users' Personal Data protection required by the law. In such event these entities shall not be authorised to use Users' Personal Data for own purposes (data shall always be processed on behalf of and for the needs of the Controller), and their actions are subject to the applicable laws and this Privacy Policy.
- 5.4. The Controller shall not sell Users' Personal Data.
- 5.5. In the case of reorganisation or sales of the activity or its part and transfer of the entire property or its part to the new owner, Users' Personal Data can be transferred to the buyer for the purpose of continuing business activity.
- 5.6. In addition, Personal Data may be transferred to providers of social plug-ins placed on the Website:
  - a) Meta Platform Ireland Ltd. - The Controller uses the social plug-ins of Facebook and Instagram on the Website and therefore shares the Website user data with Facebook and Instagram to the extent and in accordance with the privacy policy available under the links for respectively Facebook: <https://www.facebook.com/privacy/policy>, and Instagram: [https://privacycenter.instagram.com/policy/?entry\\_point=ig\\_help\\_center\\_data\\_policy\\_redirect](https://privacycenter.instagram.com/policy/?entry_point=ig_help_center_data_policy_redirect).
  - b) LinkedIn Ireland Unlimited Company - The Controller uses LinkedIn's social plugins on the Website and therefore shares the Website user's data with LinkedIn to the extent and in accordance with the privacy policy available at the link: <https://pl.linkedin.com/legal/privacy-policy>.
  - c) Google LLC - The Controller uses YouTube social plug-ins on the Website and therefore shares Website user data with YouTube to the extent and in accordance with the privacy policy available at the link: <https://policies.google.com>
  - d) Tik Tok Technology Limited and Tik Tok Information Technologies UK Limited ("Tik Tok UK") as co-Controllers - The Controller uses Tik Tok's social media plug-ins on the Website and therefore shares Website user data with Tik Tok to the extent and in accordance with the privacy policy available at the following link: <https://www.tiktok.com/legal/page/eea/privacy-policy/pl>

## 6. Transfer of Personal Data outside the European Economic Area

In connection with the Controller's use of international providers, e.g. using analytical tools provided by Google or Facebook, it is possible to transfer the User's Personal Data outside the European Economic Area (EEA,) provided that an adequate degree of protection of the Personal Data is ensured, which is established in particular by:

- a) the cooperation with the entities processing personal data in the countries with reference to which a relevant decision of the European Commission has been issued;
- b) use of standard contractual clauses issued by the European Commission;
- c) observance of valid corporate rules approved by a competent supervisory authority;

the Controller aims to limit data transfers to third countries as much as possible.

#### **7. Does automated decision-making and profiling of the User take place on the basis of Personal Data which have impact on the user?**

The Controller shall use Personal Data for assessment and automated profiling. The assessment and profiling shall be conducted for purpose of analysing of data concerning the User's activity in the Website, collecting demographic data concerning the User or for the purpose of personalisation of the content of the Website in order to improve it. The Controller also uses the geolocation data of your terminal device (if you have given your consent via your terminal device for the Website to access such data) in order to match your User profile with offers from the area.

Profiling has no legal effects for the User, nor has it any impact on the User's possibility to use the Website. It is used first of all in order to help the Controller get to know preferences and behaviours of the Website Users, and to improve the Website on the basis of such analysis. Therefore, such data are only processed for the purpose of administering the website and ensuring efficient hosting services and are not associated with the data of individual Users.

### **III. USER RIGHTS**

#### **1. Right of access**

The User shall have the right at any time to obtain information whether and what type of Personal Data are processed by the Controller. If the Controller processes the User's Personal Data, the User may obtain access to them or ask the Controller for a copy of Personal Data being subject to processing. The first copy of Personal Data is provided free of charge, the next copies can be issued against payment.

#### **2. Right to rectify Personal Data**

The User can request at any time that the Controller immediately rectify its incorrect or incomplete Personal Data.

#### **3. Right to restrict Personal Data**

The User may request at any time that processing of its Personal Data be restricted by the Controller. If the request is justified, the Controller shall only be authorised to store such Personal Data. Any other actions, apart from storing, requires a separate

consent, unless processing is necessary on account of protection of claims or rights of other person or on account of crucial reasons related to the public interest.

#### **4. Right to transfer Personal Data**

If Personal Data of the User are processed in the automated manner on the basis of the User's consent or on account of the performance of the agreement, the User may request at any time that the Controller provide its Personal Data in a structured, commonly used and machine-readable format. Upon the request of the User, Personal Data shall be sent by the Controller to other controller indicated by the User, should it be technically possible.

#### **5. Right to erase Personal Data (the so-called right to be forgotten)**

The User shall have the right to request that the Controller immediately erase its Personal Data, and if any of the grounds occurs specified in art. 17 of GDPR, the Controller shall be obliged to erase them without undue delay.

#### **6. Right to object**

If the Controller processes Personal Data of the User on the basis of a legitimate interest, the User may object to such processing at any time.

#### **7. Right to withdraw consent**

- 7.1. The User may withdraw consent for Personal Data processing at any time. Withdrawal shall not affect compliance of the processing with the law, which processing took effect prior to the withdrawal.
- 7.2. In order to effectively revoke your consent, you must contact the Controller as indicated in Section III.9.6 of the Privacy Policy;
- 7.3. The Controller assures that the application for the withdrawal of consent shall be investigated forthwith. After the application has been investigated, the Controller shall stop processing Personal Data of the User processed on the basis of the consent (e.g. for the purpose of obtaining marketing and commercial information electronically and via telephone). Until the moment of investigating the application it may happen that the User shall receive information from the Controller of which it resigned by withdrawing the consent on account of the time needed to process the application in the User's systems.
- 7.4. Withdrawal of the consent by the User shall not exclude further processing of Personal Data with the reservation that further processing shall take place for other purpose and on other grounds than processing made on the basis of the consent.

#### **8. Right to lodge a complaint**

The User shall have the right to lodge a complaint to the supervisory authority dealing with personal data protection. The Controller suggests in the first instance to address him directly as indicated in section III.9.6, which may simplify and accelerate the handling of the case.

#### **9. How can the User contact the Controller and exercise its rights?**

- 9.1. The User's request submitted to the Controller should explicitly imply the grounds for submitting such request, i.e. in particular:
  - a) Which right the User is willing to exercise;
  - b) Which processing procedure the requests refers to.
- 9.2. If the Controller is not able to identify the individual submitting the request, it shall request the User for additional information.

- 9.3. The request can be submitted in person or through intermediary (e.g. a family member). On account of Personal Data safety, the Controller shall advise to use a power of attorney certified by a notary public or by an authorised legal counsellor or advocate, which shall materially speed up verification of authenticity of the request.
- 9.4. Response to the request shall be provided within a month of receiving it. If this time limit needs to be extended, the Controller shall notify the person making the request.
- 9.5. Response shall be given via traditional mail unless the request has been made via e-mail or electronic form is requested.
- 9.6. Should the User be willing to exercise its rights, it should contact the Controller:
- a) in writing to the address of the Controller's registered office with the annotation - Service Privacy Policy, Data Protection Officer Bartosz Kozak;
  - b) via e-mail to the address: [odo.exf@exactforestall.com](mailto:odo.exf@exactforestall.com)

#### **IV. Amendments to privacy policy**

1. Personal Data Controller represents that this Privacy Policy is verified on a regular basis and updated, if necessary. The current version of the Privacy Policy is effective as of 22/10/2024.
2. Should a need arise, the Controller can modify and supplement Privacy Policy. The Users shall be notified of any changes or supplementations as part of the Website.