

JOINT CONTROLLERS

The Joint Controllers of your personal data processed for future recruitment purposes are:

ENPROM Sp. z o.o. with its registered office in Warsaw, Poland, address: ul. Taneczna 18C, 02-829 Warszawa (Joint Controller No. 1) and

Enprom Wind Sp. z o.o. with its registered office in Warsaw, Poland, address: ul. Taneczna 18C, 02-829 Warszawa (Joint Controller No. 2)

Hereinafter jointly referred to as "Joint Controllers".

The Joint Controllers can be contacted by writing to the above postal address or email:

Joint Controller No. 1 odo@enprom.pl

Joint Controller No. 2 office@enpromwind.com

DATA PROTECTION OFFICER

The Joint Controllers have appointed a point of contact for matters related to personal data protection to iod@enprom.pl or by mail to the following address: ENPROM Sp. z o.o., ul. Taneczna 18C, 02-829 Warszawa

LEGAL BASIS AND PURPOSE OF DATA PROCESSING

Your personal data included in the questionnaire will be processed for the purposes and legal basis indicated below:

- a) In order to take part in future recruitment processes in respect of ordinary data on the basis of consent to data processing under Article 6(1)(a) of the GDPR, and as regards special category data on the basis of an explicit declaration by the recruiter under Article 9(2)(a) of the GDPR,
- b) in order to act upon the recruiter's request and for the purpose of its conclusion and execution (Article 6(1)(b) GDPR),
- c) in order to pursue the legitimate interest of the Controller in establishing, pursuing or defending against such claims (Article 6(1)(f) of the GDPR and, where special categories of data have been made available, also Article 9(2)(f) of the GDPR),
- d) in the event that 24 months have elapsed since the consent was given for future recruitment, in order to ask whether the candidate still wishes to participate in recruitment processes for subsequent periods in connection with the exercise of the legitimate interest of the controller under Article 6(1)(f) GDPR, which is considered to be the desire to build a database of potential employees,

RECIPIENTS OF THE DATA

Recipients of your personal data may be state entities authorised to access the data to the extent and for the purpose specified in specific legislation, entities with whom data processing entrustment agreements have been concluded, in particular partners providing technical services (e.g. development and maintenance of IT systems and websites, e-mail), companies providing courier and postal services.

DATA PROCESSING PERIOD

Personal data processed for the purpose of taking part in future recruitment will be processed for a period of 24 months, unless you withdraw your consent to data processing earlier. Personal data processed on the basis of the legitimate interest of the Controller shall be processed for the period of the realization of the interest, unless you object to the processing of your personal data earlier.

RIGHTS OF DATA SUBJECTS

You have:

- a) the right to access to the content of your data,
- b) the right to rectification of your data,
- c) the right to erasure your data,
- d) the right to restriction of processing,
- e) the right to data portability,
- f) the right not to be subject to automated decisions, including profiling;
- g) the right to object to the processing of your personal data (to cease processing your data for specific purposes) if the legal basis for the processing is a legitimate interest (Article 6(1)(f) GDPR). When lodging an objection, please indicate the reasons related to your particular situation. The controller shall no longer be permitted to process these personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for the establishment, exercise or defence of claims.
- h) the right to withdraw consent at any time without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.

If you consider that the processing of your personal data violates the provisions of the GDPR, you have the right to lodge a complaint with the President of the Office for Personal Data Protection.

NECESSITY TO PROVIDE THE DATA

The provision of personal data processed on the basis of the consent is fully voluntary, failure to provide personal data will not result in negative consequences. In the event of negotiating the terms of a contract for the purposes of employment under a civil law contract, the provision of data is necessary, since the failure to provide data will make it impossible or considerably difficult to conclude a contract. Providing data on the basis of the legitimate interest of the controller is voluntary, failure to provide personal data will not cause negative consequences.

AUTOMATED DECISION-MAKING

Your data will not be processed in an automated manner, including profiling.

TRANSFER OF DATA TO THIRD COUNTRIES

As a rule, personal data will not be transferred outside the European Economic Area (hereinafter: EEA). However, having regard to the services provided by the Controller's subcontractors in the provision of support for ICT services and IT infrastructure, the Controller

may outsource the performance of specific activities or IT tasks to recognised subcontractors operating outside the EEA, which may result in the transfer of data outside the EEA. In accordance with the decision of the European Commission, individual countries outside the EEA, on the territory of which personal data will be processed, ensure an adequate level of personal data protection in line with EEA standards.

However, in the case of the processing of personal data in the territory of countries for which the European Commission has not found to ensure an adequate level of personal data protection (compatible with EEA standards), in order to ensure an adequate level of protection, the Controller shall conclude agreements with the recipients of personal data. The agreements referred to above are based on the standard contractual clauses issued by the European Commission pursuant to Article 46(2)(c) of the GDPR. A copy of the standard contractual clauses referred to above may be obtained from the Controller. The method of securing the data used by the Controller complies with the rules provided for in Chapter V of the GDPR. Therefore, you may request further information on the safeguards applied in this regard, obtain a copy of these safeguards and information on where they are made available.

MAIN CONTENT OF THE JOINT ARRANGEMENT

(excerpt from the agreement of personal data co-administration)

Pursuant to Article 26 of the GDPR, we inform you that the Joint Controllers, with the identities set out below, have made the following arrangements:

1. The Joint Controllers of your personal data are:
 - 1.1. ENPROM Sp. z o.o. with its registered office in Warsaw, Poland, address: 18C Taneczna Street, 02-829 Warsaw **(Joint Controller No. 1)**
 - 1.2. Enprom Wind Sp. z o.o. with its registered office in Warsaw, Poland, address: 18C Taneczna Street, 02-829 Warsaw **(Joint Controller No. 2)**
2. The Joint Controllers have established contact points for data subjects - they can be contacted by writing to the following addresses:
 - 2.1. by email: iod@enprom.pl
 - 2.2. by postal correspondence: Enprom Sp. z o.o., ul. Taneczna 18 C, 02-829 Warszawa
3. In connection with the recruitment process via the application form available at www.enpromwind.com, the Joint Controllers jointly process your personal data in accordance with the principles for the processing of personal data set out in Article 5 of the GDPR on the grounds indicated in the information obligation under the application form.
4. The provision of this information is the provision of the main content of the joint arrangements of the Joint Controllers, whose identities are indicated in the first clause above, for the co-administration of the processing of recruits' personal data.
5. Under the joint arrangements, the Joint Controllers are responsible for:
 - 5.1. Each of the Joint Controllers is responsible in its own for:
 - 5.1.1. the processing of personal data in accordance with the provisions on the protection of personal data, including the principles set out in Article 5, 25, 32, 35-36 of the GDPR,
 - 5.1.2. the exercise of the rights of natural persons referred to in Articles 15-22 of the GDPR,
 - 5.1.3. the proper safeguarding of personal data from the moment of receiving documentation with personal data;
 - 5.1.4. the storage of documentation containing personal data of data subjects;
 - 5.1.5. ensuring accountability in the scope of fulfilling the obligations assigned to individual Joint Controllers;
 - 5.1.6. maintaining documentation describing the way in which personal data are processed, including a register of data processing activities (a requirement of Article 30 of the GDPR);
 - 5.1.7. notifying to the supervisory authority the breach referred to in Article 33 of the GDPR,
 - 5.1.8. notifying a person about a breach of data protection, if it is likely to result in a high risk of violating the rights or freedoms of natural persons.

6. **The Joint Controller no. 1 shall further be responsible for:**
 - 6.1. the exercise of the rights of natural persons referred to in Articles 15-22 of the GDPR, if the requests of such persons concern processing by both Joint Controllers, for this purpose it shall designate as a point of contact the DPO's email address: iod@enprom.pl. Please be advised that regardless of the arrangements for the exercise of rights, data subjects may exercise their rights under the GDPR against each of the Joint Controllers, which means that a request for the exercise of rights addressed to each of the Joint Controllers is a request submitted in accordance with the GDPR. See paragraph 8 below.

7. **The Joint Controller no. 2 shall further be responsible for:**
 - 7.1. in the case of submitting the application in the manner set out in clause 3 – using the joint information clause on the rules for the processing of personal data by the Joint Controllers, including the main content of their arrangements regarding the fulfilment of their obligations regarding the personal data protection;
 - 7.2. entering into personal data processing entrustment agreements with data processors on behalf of the Joint Controllers,
 - 7.3. after the termination of the Arrangement concluded between the Joint Controllers, to further storage of personal data, as well as documentation related to the protection of personal data, within the time limits specified by applicable laws and in order to fulfil the obligations under Article 5(2) of the GDPR;

8. During co-administration of personal data, at any stage of processing, each of the Joint Controllers shall ensure data subjects exercise their rights under the GDPR, i.e.: the right to withdraw consent at any time pursuant to Article 7 of the GDPR, the right of access and to receive a copy of the data pursuant to Article 15 of the GDPR, the right to rectification and completion pursuant to Article of the 16 GDPR, the right to erasure pursuant to Article of the 17 GDPR, the right to restrict data processing pursuant to Article 18 of the GDPR, the right to data portability pursuant to Article 20 of the GDPR, the right to object to data processing pursuant to Article 21 of the GDPR, the right not to be subject to automated decisions, including profiling pursuant to Article 22 of the GDPR, the right to lodge a complaint with a supervisory authority pursuant to Article 77 of the GDPR.

9. If you would like to get more information on co-administration, please contact us in the way as indicated in clause 2 above.

I declare that by ticking the checkboxes indicated below or entering other information about my health, I consent to the processing of my personal data of a special category in the form of health data in order to participate **in future recruitment processes** by the Joint Controllers ENPROM Sp. z o.o. with its registered office in Warsaw, Poland, address: ul. Taneczna 18C, 02-829 Warszawa and ENPROM Wind Sp. z o.o. with its registered office in Warsaw, Poland, address: ul. Taneczna 18C, 02-829 Warszawa.

If you do not tick the checkboxes, we will not process this data. Consent may be withdrawn at any time by writing to iod@enprom.pl.

Withdrawal of consent does not affect the legality of processing, which was carried out on the basis of consent before its withdrawal.