



## INFORMATION NOTICE FOR CANDIDATES

This information notice is intended for **candidates**, whose personal data we do process. We provide the below information because to act in accordance with the General Data Protection Regulation ("the GDPR"). The information notice makes you aware how your personal data will be processed and retained.

### 1. What types of your personal data do we process

In connection with your application we may process the following data:

- the information you have provided to us in your CV and/or covering letter and on your application, including your name, title, address and contact details, email address, telephone number, date of birth, information about your education, your qualifications, skills, experience and employment history;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status and dependants;
- information about your nationality and entitlement to work;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- any information you provide to us during an interview;
- other data similar to the categories mentioned above.

### 2. Who is the Controller of the data

The controller of your personal data is **Rhapsody CE Sp. z o.o.** (ul. Aleja Armii Ludowej 14, 00-638 Warszawa, Poland). Detailed contact information is to be found on our website: <https://rhapsodymedia.com/contact-us>. We also created a dedicated e-mail address to which you can send your queries etc. relating to matters regarding the processing of your personal data: [dpo@rhapsodymedia.com](mailto:dpo@rhapsodymedia.com).

### 3. How do we collect your personal data

We collect your personal data in a variety of ways.

We process the data that we have obtained directly from you in the context of recruitment process. The data might be contained in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews.



We also process personal data about you that we have obtained from other sources, in particular: previous employers, recruitment agencies or other sources of candidate referrals; publically available social media, professional networks and other publicly available sources.

#### **4. Why do we need your personal data for and what are the legal grounds for processing**

We will use the personal data we collect about you to:

- assess your skills, qualification and suitability for the role;
- carry out reference checks;
- offer you a position;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

We have a **legitimate interest** in processing personal data during the recruitment process and for keeping records of the process. Processing data from you allows us to manage the recruitment process, assess and confirm your suitability for employment and decide to whom to offer a job. We may also need to process data from you to respond to and defend ourselves against legal claims.

We also need to process your personal data to decide whether to enter into a contract of employment or engagement with you. In this case the processing is **necessary to take steps at the request of the data subject prior to entering into a contract.**

In some cases, we need to process data to ensure that we are **complying with our legal obligations.** For example, it is required to check an employee's entitlement to work in Poland.

We process health information in order to consider whether to make or provide reasonable adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview. We do it **in compliance with our obligations** under employment, social security and social protection law.

We may also rely on your **consent** if we process your data for the future recruitment process and you have provided us with such consent.

#### **5. To whom do we disclose your personal data**

Not only we process your personal data, we also disclose it to various groups of recipients. We may disclose your personal data to other companies from our Group and service providers such as external companies in the context of maintenance, repair, updating of IT systems. We may also be obliged to share the data in compliance with a legal obligation or in compliance with our obligations in respect of regulatory bodies, government bodies and agencies or courts and court-appointed persons.



Your personal data is entered into our IT systems and is stored there for easy access whenever we need it.

## **6. Are you obliged to disclose your personal data to us**

In case of current recruitment process you are obliged to provide us with the data specified in the Labour Code (name, surname, data of birth, contact data, education, qualifications, employment history).

If you apply for the employment under civil contract providing the data is necessary to take steps at the request of the data subject prior to entering into a contract.

For other data it is voluntary to disclose it however, if you do not provide all or part of the information requested by the Company, it may not be possible to proceed with recruitment process.

If we process the data for the future recruitment processes ( on the basis of your consent ) you provide your data on the voluntary basis.

## **7. How long do we retain your personal data**

- **Successful applicants**

If your application for employment or engagement is successful, personal data gathered during the recruitment process will be transferred to our systems and retained during your employment in accordance with our employee information notice.

- **Unsuccessful applicants**

If your application for employment or engagement is unsuccessful, we will hold your data on file for 3 years after the end of the relevant recruitment process to the extent necessary to enable the Company to comply with any legal obligations or for the exercise or defence of legal claims.

## **8. Will the data be transferred to a third country**

Due to the use of Microsoft Azure and Google cloud services, personal data may potentially be transferred to third countries (outside of the European Economic Area). In such event the transfer is secured by Standard Contractual clauses.

## **9. When may you object to our processing of your personal data**

In case of processing of your personal data as a result of our legitimate interest you have the right to object to it at any time, but not in any situation. You may do so only when a special



situation concerning you arises. We may also indicate important, legitimate grounds to be able to further process your personal data or to do it to assert our right or in defence.

In addition, you have the right to object to the processing of your personal data by us at any time and regardless of additional circumstances, but only if we process it for the purposes of direct marketing or profiling.

## **10. What are your rights in connection with processing**

First of all, you may request us to immediately **erase your personal data** (the right to be forgotten). You may exercise this right in cases specified in the law, e.g. when we do not need your personal data any more for the purposes it has been collected.

You also have the right to:

- **Access your personal data**, including to receive a confirmation that we process your personal data, to access it, and to receive from us particular information related to the processing of it;
- Request from us an **rectification of your personal data**, if it is inaccurate or if your personal data is incomplete;
- Request us to **restrict the processing of your personal data** in cases specified in the law (e.g. when you question the correctness of your personal data processed by us);
- Request us to save your personal data in a file in a commonly available format in a structured manner and transmit it to a controller of your choosing (**right to data portability**);
- Submit a **complaint to the Data Protection Authority** if you think that we process your personal data against the law.

If you wish to exercise any of those rights, send us an e-mail to the address [dpo@rhapsodymedia.com](mailto:dpo@rhapsodymedia.com) with a content that would help us determine what your expectations are.

## **11. How do we protect data**

We take the security of your data seriously. We have internal policies (such as our Data Privacy policy and Information Security Policy) and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable data protection authority of a suspected breach where we are legally required to do so. All of



your data will therefore be held securely and processed only by those who use your data for the purposes of the recruitment process as referenced above.

Where we engage third parties, to process your personal data on our behalf, they do so as the data processor on the basis of the proper data processing agreements and they are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of your data.

### **12. Is my data subject to automated decision making or profiling**

No, your data will not be subject to profiling or other decisions that will have significant impact on you based solely on automated decision making.