




INFORMATION ON PROCESSING OF PERSONAL DATA OF EMPLOYEES AND ASSOCIATES AT RTB HOUSE


This notice is being shared with you in order to describe how RTB House processes your personal data in the context of your work at or cooperation with RTB House, as well as to follow transparency obligations arising from personal data laws.




You do not need to take any action as a result of being disclosed this notice.





In case of any questions, please contact legal.dataprivacy@rtbhouse.com.



<p style="text-align: center;">CONTROLLER</p> 	<p>The controller responsible for processing your personal data related to your employment or cooperation with RTB House is an RTB House company you have a contract with “we” or “RTB House”.</p>
<p style="text-align: center;">CONTACT DETAILS</p> 	<p>In certain RTB House companies, including those incorporated in the EU countries, we have appointed a data protection officer (DPO). You can contact our DPO by email at dpo@rtbhouse.com.</p> <p>You can also contact the controller (1) by mail at the address indicated in your contract with RTB House or of our HQ: 61/101 Żłota St., 00-819 Warsaw, Poland, or (2) by telephone: +48 22 188 12 71.</p>
<p style="text-align: center;">CATEGORIES OF COLLECTED DATA AND PURPOSES FOR THE PROCESSING</p> 	<p>We process the following categories of personal data:</p> <ul style="list-style-type: none"> (a) name, title, residence address, telephone number, personal email addresses, national identification number, tax number, bank account number, salary, benefits-related data, information about working hours, vacation and absences, information about your participation in internal bodies as well as other necessary data for the purpose of conclusion, amending and execution a contract with you (on the basis of contractual obligations); (b) name, national identification number, residence address, tax number, tax residence information, mandatory health insurance information, health and safety-related information, date and place of birth, citizenship, family name, benefits-related data, bank account number, copy of student ID card as well as copy of passport (if applicable), salary, benefits, medical leave information, tax information, residence status, visa and academic diploma (if applicable), termination date and termination reason, information about your participation in internal bodies as well as other necessary data for the purpose of performing duties stemming from the provisions of law within the scope related to employees or associates (on the basis of legal

	<p>obligations, including those related to the obligations under the provisions of the tax legislation on reporting tax schemes);</p> <p>(c) name, answers to training assignments as well as other necessary data for the purpose of performing activities related to responsibilities and rights arising from a contract, including organization of training sessions as well as for the purpose of employees' or associates' development (on the basis of legitimate interest);</p> <p>(d) name, information relating to misconducts and disciplinary actions as well as other necessary data for the purpose of employment or associate relationships management (on the basis of legitimate interest);</p> <p>(e) name, job title, business email address for the purpose of running our business, including acquisition of clients, subcontractors, service providers or business partners and performance of agreements concluded with them, as well as contact with any other entities or institutions if it is necessary for conducting our ongoing operation (on the basis of legitimate interest);</p> <p>(f) name, job title, business email address, start date, termination date, your business activities, and other sales-related data for the purpose of improving and increasing sales performance, including analysis of results and achieving sales goals in RTB House (on the basis of legitimate interest);</p> <p>(g) name, ID number from Portal, function, business email address, name of the RTB House company you have an agreement with, start date, termination date, scope of your duties within the function as well as other necessary data for the purpose of managing authorizations to process personal data and preventing unauthorized access to data (on the basis of legitimate interest and on the basis of legal obligations);</p> <p>(h) name, business email address, magnetic card number and ID number of entrusted data carrier devices (if applicable) as well as other necessary data for the purpose of entrusting RTB House's property to employees or associates (on the basis of legitimate interest);</p> <p>(i) name, performance-related data, such as your objectives, performance discussions and assessment records, feedback and tests results, qualifications and personal development-related data, records of competence assessments, learning and development records, certificates, licenses and vocational records, records of career and succession planning, statistics and metrics indicating your performance as well as other necessary data for the purpose of conducting contract performance reviews and internal recruitment within RTB House corporate group as well as for the purpose of</p>
--	---

	<p>employees' or associates' development (on the basis of legitimate interest);</p> <p>(j) name, traveling and travel expenses related data as well as other necessary data for the purpose of organizing business trips, including taxi management (on the basis of legitimate interest);</p> <p>(k) name, business email address, address for the delivery, phone number, as well as other necessary data for the purpose of arranging and delivering occasional gifts for RTB House employees (on the basis of legitimate interest);</p> <p>(l) name, title, salary and other terms of your contract, information about vacation and absences as well as other necessary data for the purpose of conducting due diligence of our business operation and conducting statistics (on the basis of legitimate interest);</p> <p>(m) your image as well as other personal data you voluntarily provided RTB House with for the specific purposes beforehand communicated to you (on the basis of your consent).</p>
<p>LEGAL BASIS FOR THE PROCESSING</p> 	<p>The legal basis for processing of your personal data as indicated in the above row, is:</p> <p>(a) a necessity for the performance of a contract or in order to take steps at your request prior to entering into a contract ("contractual obligations");</p> <p>(b) a necessity to comply with legal obligations to which the controller is subject within the scope of the duties and responsibilities arising from provisions of law ("legal obligations"), specifically provisions of labor, social insurance and health insurance laws (if applicable), tax laws and accounting laws;</p> <p>(c) legitimate interests pursued by the controller ("legitimate interest"), specifically the legitimate interest such as providing security at RTB House facilities (including information security and keeping confidentiality of RTB House confidential information), managing property entrusted to employees or associates, providing administrative, financial and IT services, managing employment or associate relationships, running our business, pursuing claims and protecting our rights, conducting contract performance reviews and internal recruitment, conducting due diligence of our business operation, conducting statistical analysis; or</p> <p>(d) your consent ("consent").</p>

<p>RECIPIENTS OF PERSONAL DATA</p> 	<p>RTB House may disclose your personal data, depending on circumstances, to: its subcontractors (including other associates of RTB House), service providers, client or business partners, as well as any other entities or institutions in connection with performance of your contract with RTB House and running our ongoing business operation.</p> <p>In certain situations your data will also be shared with other companies from the RTB House corporate group, acting either as data processors (e.g. shared services center) or independent data controllers (to the extent necessary for internal administrative purposes).</p> <p>In cases where it is necessary or required by law, we may also share your personal data with law enforcement agencies, supervisory authorities or in court proceedings.</p>
<p>TRANSFERS TO OTHER COUNTRIES</p> 	<p>RTB House may occasionally transfer your data outside the country of incorporation of the RTB House company you have an agreement with.</p> <p>In such cases, we will take appropriate safeguards to ensure the transfer is in compliance with applicable laws. To find out more about safeguards we apply, please contact our data protection officer at: dpo@rtbhouse.com. By reading this privacy notice you acknowledge that your personal data may be transferred outside the country of incorporation of the RTB House company you have an agreement with.</p>
<p>RETENTION PERIOD</p> 	<p>Your personal data will be retained for the period necessary to accomplish purposes indicated above.</p> <p>RTB House will store your personal data necessary to handle our cooperation for the duration of the concluded contract and after its termination the data will be kept until the lapse of the period of limitation of claims in accordance with applicable provisions. If a dispute arises between you and RTB House, we will store your personal data until its final and binding resolution (including enforcement of claims).</p> <p>Personal data contained in tax records or accounting records will be stored by RTB House until the expiration of data storage obligations stemming from provisions of law.</p> <p>RTB House shall store your personal data contained in personal files, payrolls and pay slips for a period required by applicable provisions of laws regarding personal documentation.</p>

<p>DATA SUBJECT'S RIGHTS</p>  	<p>You have the right to know about the data processing we conduct and what personal data we have about you. If your personal data is wrong or incorrect, you can tell us and we will fix it. Until that happens, you have the right to restrict the processing and it will be limited to storage only for that time.</p> <p>If you no longer wish to have your personal data processed you can also exercise your right to object or ask for its erasure. In certain situations we may still keep some of your personal data even after your request. This may happen due to the legal obligation imposed on us or in order to meet our business needs.</p> <p>If we process your personal data by automated means and on the basis of consent or of fulfilling a contract, you have a right to receive personal data that you have provided to us in a machine-readable format. You can also ask us to have this personal data transmitted directly from us to another controller, where technically feasible.</p> <p>When we process your data on the basis of consent, you have the right to withdraw it at any time. Withdrawal of consent does not affect the legality of the processing done up to that point.</p> <p>To know more about your data protection rights and how to exercise them you can contact our data protection officer at: dpo@rtbhouse.com.</p>
<p>AUTOMATED DECISION-MAKING</p> 	<p>We will not use your data for automated decision-making or profiling.</p> <p>While our AI systems may assist in processing personal data, any decisions that significantly affect you, such as those related to employment conditions or performance evaluations, will involve human oversight. We do not rely solely on automated decision-making processes without human intervention.</p>
<p>SOURCE OF PERSONAL DATA</p> 	<p>We obtain most of your personal data directly from you. However, we may also obtain certain information from official sources, such as the Social Security Office or other state bodies.</p> <p>In specific cases, if you are an independent subcontractor, we may obtain some of your personal data (as e.g. tax identification number) also from publicly available sources such as public registers or databases of entrepreneurs.</p>

<p>OBLIGATION TO DISCLOSE PERSONAL DATA</p> 	<p>You need to provide us with your personal data because it is a statutory and a contractual requirement.</p> <p>Without this personal data it would not be possible to execute the contract concluded between you and RTB House. The obligation to provide personal data related to employment and social insurance (if applicable) or tax matters is a statutory requirement. Refusal to provide your personal data may render it difficult or impossible to fulfill our statutory obligations. Whenever providing your data is not required, RTB House will ask for your consent or explain the legitimate interest it has in processing it. In any case, providing your personal data is necessary to fulfill the purposes for processing described above.</p>
<p>RIGHT TO LODGE A COMPLAINT</p> 	<p>If you think your data protection rights have been breached, you have the right to lodge a complaint with a specific Data Protection Authority for the respective RTB House company.</p> <p>To find out more about your rights regarding the processing of your personal data and how to exercise them, please contact our Data Protection Officer at: dpo@rtbhouse.com.</p>