

## Simple Way Privacy Policy

Information on the processing of personal data from 01-03-2024 r.

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### 1. Data controller

SIMPLE WAY Spółka z ograniczoną odpowiedzialnością spółka komandytowa, located in Międzychód (64-400), at ul. Wigury 20, entered into the Register of Entrepreneurs, kept by the District Court for Poznań Nowe Miasto i Wilda, 9th Commercial Division of the National Court Register, under the number KRS: 0000342324 (NIP: 5951455352, REGON: is the controller of the Customer's data (the "Company" or "Controller").

### 2. Data Protection Officer

Piotr Sowa has been appointed as the Data Protection Officer supervising the data protection compliance. You can contact the Inspector in all matters concerning the processing of personal data by the Company and the rights relevant to the processing of personal data. You can contact the Inspector by e-mail at [rodo@simpleway.com.pl](mailto:rodo@simpleway.com.pl) or in writing at SIMPLE WAY Sp. z o.o. sp. k. located in Międzychód (64-400), at ul. Wigury 20.

### 3. Information for customers (natural persons conducting business activity)

#### 3.1 The purpose of and legal basis for processing

Purpose of processing	Legal basis for processing under the Regulation of the European Parliament and of the Council (EU) 2016/679 (GDPR).	Retention period
Establishing trade relations	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - pursuing the sales of services.	until filing an effective objection to processing / requesting to erase the data
Verification of financial and commercial credibility of a potential customer	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company, material liquidity support.	3 years from obtaining the data or until filing an effective objection to processing / requesting to erase the data
Establishing legal relationship and performing the contract between the Company and the Customer	The processing is necessary for the performance of a contract or in order to take steps before entering into a contract (Article 6.1(b) of GDPR).	until the termination of the contract
Keeping transport documentation	The processing is necessary for compliance with a legal obligation (Article 6.1(c) of GDPR in conjunction with Article 38 of the Transport Law, Article 6 of the Convention on the Contract for the International Carriage of Goods by Road (CMR), and applicable local law on cabotage transport.	5 years from the beginning of the year following the fiscal year
Accounting and tax record keeping	The processing is necessary for compliance with a legal obligation (Article 6.1(c) of GDPR) in conjunction with Article 74 of the Accounting Act.	5 years from the beginning of the year following the fiscal year
Sending invoices and CMR electronically	The processing is based on consent (Article 6.1(a) of GDPR). Sending electronic invoices requires consent - in connection with Article 106n.2 of the Act on Goods and Services Tax.	until the withdrawal of consent or objection
Conducting conventional marketing activities for own services	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests and good reputation of the Company, promoting its activities.	until filing an effective objection to processing / requesting to erase the data
Conducting conventional marketing activities for partners' services	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting and selling partners' services.	until filing an effective objection to processing / requesting to erase the data

<b>Conducting marketing activities with the use of electronic means of communication</b>	The processing is based on consent (in conjunction with the Act of 18 July 2002 on Electronic Services and the Act of 16 July 2004 the Telecommunication Law).	until the withdrawal of consent or objection
<b>Examination of complaints and requests</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests and good reputation of the Company.	until the limitation of claims
<b>Debt collection</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company, material liquidity support.	until full settlement
<b>Confirmation of balances, verification of processed data</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company, compliance with the responsibilities regarding the inventory (balance confirmation), pursuing the accuracy of the counterparties data.	until the limitation of claims
<b>Insurance coverage and reporting damage</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company in the event of damage, the right to insurance coverage and loss adjustment.	3 years after the date of the event
<b>Establishing, redressing or defending against possible claims</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - establishing, redressing or defending against any reported claims as part of the measures taken before the initiation of proceedings, during court or enforcement proceedings, or in front of others authorities.	until the limitation of claims

### 3.2 Source and categories of data

We process only the usual categories of data (identification, contact, registration and commercial details), which come from public sources or companies related personally and financially.

### 3.3 Data recipients

The controller can transfer your data, to fulfil the obligations of the Company, only to trusted recipients, such as state authorities or other entities empowered by law, the providers of IT services, e-mail hosting, information systems, to entities providing insurance, postal, courier, transport, forwarding and financial services as well as legal and economic consultants (who provide services to the Company). The data is also transferred to the sender and recipient of the commissioned transport and any companies related personally and financially.

### 3.4 Data retention period

The controller is obliged to store documents containing personal data of the Customer throughout the contract and for the mandatory documentation retention period related to the above objectives, determined under separate regulations. In so far as the Customer's personal data is processed based on consent - until its withdrawal. In so far as the Customer's data is processed to pursue the legitimate interests of the Company - establishing, redressing or defending against any claims reported in court or enforcement proceedings, or before other state authorities - the Customer's data can be stored by the Company until the limitation of possible claims. In so far as the Customer's data is processed to pursue the legitimate interests of the Company - conducting marketing activities to promote its activities - the Customer's data can be stored by the Company until the objection to the processing is submitted.

### 3.5 Transfer of data to third countries

In the event international transport services are commissioned to be performed outside the territory of the European Union, your data (necessary for the execution of the order) will be transferred to third countries where GDPR does not apply. In such a case, other appropriate legal safeguards and guarantees will be applied to protect your personal data.

### 3.6 Your rights

In view of the fact that the Company processes your personal data, you have the right of access to and rectification or erasure of your personal data (in case your data are incorrect) or restriction of processing or to object to processing as well as the right to data portability (for data to which processing the Customer has consented or which are processed based on contract). In so far as the processing of personal data is based on consent, the Customer has the right to withdraw consent at any time, without affecting the lawfulness of processing. If the processing of personal data by the Company is deemed to violate the provisions of GDPR, you have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

You have the right to object to the processing, the aim of which is the legitimate interest of the controller (Article 6.1(f) of GDPR). Each request to exercise the Customer's rights will be assessed and verified by the Company. The answer to the request will be provided immediately.

### 3.7 The obligation to provide data

You are free to provide your personal data, but it is necessary to establish and build, change or terminate legal relationship between the Company and the Customer, to perform the contract between the Company and the Customer, and to settle the Company's business. Failing to provide your personal data will result in failure to establish, build, change or terminate legal relationship between the Company and the Customer, to perform the contract between the Company and the Customer, and to settle the Company's business.

## 4. Information for carriers

### 4.1 The purpose of and legal basis for processing

Purpose of processing	Legal basis for processing under the Regulation of the European Parliament and of the Council (EU) 2016/679 (GDPR).	Retention period
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<b>Establishing relationships with a potential carrier</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - using services provided by subcontractors to pursue economic activity.	until filing an effective objection to processing / requesting to erase the data
<b>Analysis of transport powers, competencies and capabilities of the carrier</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company, securing the performance of the contract concluded with the principal or a potential principal; organizing transport according to the requirements in Article 55a of the Transport Law and in conjunction with Article 3 of the Convention on the Contract for the International Carriage of Goods by Road (CMR).	6 years from obtaining the data or until filing an effective objection to processing / requesting to erase the data
<b>Establishing legal relationship and performing the contract between the Company and the carrier</b>	The processing is necessary for the performance of a contract or in order to take steps before entering into a contract (Article 6.1(b) of GDPR).	until the termination of the contract
<b>Keeping transport documentation</b>	The processing is necessary for compliance with a legal obligation (Article 6.1(c) of GDPR in conjunction with Article 38 of the Transport Law, Article 6 of the Convention on the Contract for the International Carriage of Goods by Road (CMR), and applicable local law on cabotage transport.	5 years from the beginning of the year following the fiscal year
<b>Accounting and tax record keeping</b>	The processing is necessary for compliance with a legal obligation (Article 6.1(c) of GDPR) in conjunction with Article 74 of the Accounting Act.	5 years from the beginning of the year following the fiscal year
<b>Insurance coverage and reporting damage</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company in the event of damage, the right to insurance coverage and loss adjustment.	3 years after the date of the event
<b>Establishing, redressing or defending against possible claims</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - establishing, redressing or defending against any reported claims as part of the measures taken before the initiation of proceedings, during court or enforcement proceedings, or in front of others authorities.	until the limitation of claims

## 4.2 Source and categories of data

We process only the usual categories of data (identification, contact, registration and commercial details), which come from public sources, or from companies participating in the performance of transport services, such as your employer, carrier commissioning the service, and from companies related personally and financially.



#### 4.3 Data recipients

The controller can transfer your data, to fulfil the obligations of the Company, only to trusted recipients, such as state authorities or other entities empowered by law, the providers of IT services, e-mail hosting, information systems, to entities providing insurance, postal, courier, transport, forwarding and financial services as well as legal and economic consultants (who provide services to the Company). The data is also transferred to the sender and recipient of the commissioned transport and any companies related personally and financially.

#### 4.4 Data retention period

The controller is obliged to store documents containing personal data of throughout the contract and for the mandatory documentation retention period related to the above objectives, determined under separate regulations. In so far as your data is processed for the implementation of legitimate interests of the Company, your data can be stored by the Company until the limitation of possible claims.

#### 4.5 Transfer of data to third countries

In the event international transport services are commissioned to be performed outside the territory of the European Union, your data (necessary for the execution of the order) will be transferred to third countries where GDPR does not apply. In such a case, other appropriate legal safeguards and guarantees will be applied to protect your personal data.

#### 4.6 Your rights

In view of the fact that the Company processes your personal data, you have the right of access to and rectification or erasure of your personal data (in case your data are incorrect) or restriction of processing or to object to processing as well as the right to data portability (for data processed based on contract). If the processing of personal data by the Company is deemed to violate the provisions of GDPR, you have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

You have the right to object to the processing, the aim of which is the legitimate interest of the controller (Article 6.1(f) of GDPR).

#### 4.7 The obligation to provide data

You are free to provide your personal data, but it is necessary to conclude the contract, perform the contract and settle the operations. Failing to provide personal data will result in failure to conclude or perform the contract.

### 5. Information for service providers

#### 5.1 The purpose of and legal basis for processing

Purpose of processing	Legal basis for processing under the Regulation of the European Parliament and of the Council (EU) 2016/679 (GDPR).	Retention period
Establishing legal relationship and the	The processing is necessary for the performance of a contract or in order to take steps before entering into a contract (Article 6.1(b) of GDPR).	until the termination of the contract

<b>performance of the contract</b>		
<b>Accounting and tax record keeping</b>	The processing is necessary for compliance with a legal obligation (Article 6.1(c) of GDPR) in conjunction with Article 74 of the Accounting Act.	5 years from the beginning of the year following the fiscal year
<b>Establishing, redressing or defending against possible claims</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - establishing, redressing or defending against any reported claims as part of the measures taken before the initiation of proceedings, during court or enforcement proceedings, or in front of others authorities.	until the limitation of claims

## 5.2 Data recipients

The controller can transfer your data, to perform the obligations of the Company, only to trusted recipients such as state authorities or other entities empowered by law, the providers of IT services, e-mail hosting, information systems, to entities providing postal, courier, transport, forwarding and financial services as well as legal consultants.

## 5.3 Data retention period

The controller is obliged to store documents containing personal data of throughout the contract and for the mandatory documentation retention period related to the above objectives, determined under separate regulations. In so far as your data is processed for the implementation of legitimate interests of the Company, your data can be stored by the Company until the limitation of possible claims.

## 5.4 Your rights

In view of the fact that the Company processes your personal data, you have the right of request access to and rectification or erasure of your personal data (in case your data are incorrect) or restriction of processing or to object to processing as well as the right to data portability (for data processed based on contract). If the processing of personal data by the Company is deemed to violate the provisions of GDPR, you have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

You have the right to object to the processing, the aim of which is the legitimate interest of the controller (Article 6.1(f) of GDPR).

## 5.5 The obligation to provide data

You are free to provide your personal data, but it is necessary to conclude the contract, perform the contract and settle the operations. Failing to provide personal data will result in failure to conclude or perform the contract.

## 6. Information for the persons communicating and using contact form

### 6.1 The purpose of and legal basis for processing

Purpose of processing	Legal basis for processing under the Regulation of the European Parliament and of the Council (EU) 2016/679 (GDPR).	Retention period
Electronic correspondence	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR - to conduct correspondence in connection with business operations and solve any issues described in the correspondence.	6 years from giving or receiving correspondence
Establishing, redressing or defending against possible claims	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - establishing, redressing or defending against any reported claims as part of the measures taken before the initiation of proceedings, during court or enforcement proceedings, or in front of others authorities.	until the limitation of claims

## 6.2 Data recipients

The controller can transfer your data, to perform the obligations of the Company, only to trusted recipients such as state authorities or other entities empowered by law, the providers of IT services, e-mail hosting, information systems, to entities providing postal, courier, transport, and forwarding services as well as legal and economic consultants (who provide services to the Company). The data is also transferred to companies related personally and financially.

## 6.3 Data retention period

After completion of the communication, we will retain data in order to defend against possible claims and to assert any claims until the limitation period (about 6 years).

## 6.4 Your rights

In view of the fact that the Company processes your personal data, you have the right of access to and rectification or erasure of your personal data (in case your data are incorrect) or restriction of processing. If the processing of personal data by the Company is deemed to violate the provisions of GDPR, you have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

You have the right to object to the processing, the aim of which is the legitimate interest of the controller (Article 6.1(f) of GDPR). Each request to exercise the Customer's rights will be assessed and verified by the Company. The answer to the request will be provided immediately.

## 6.5 The obligation to provide data

You are free to provide your personal data, but it is necessary to conduct the correspondence. Failing to provide personal data will result in failure to conduct the correspondence.

## 7. Information for representatives of contractors

### 7.1 The purpose of and legal basis for processing



Purpose of processing	Legal basis for processing under the Regulation of the European Parliament and of the Council (EU) 2016/679 (GDPR).	Retention period
Establishing business relationships with an entity which represents the person	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - pursuing the sales of services.	until filing an effective objection to processing / requesting to erase the data
Establishing legal relationship and the performance of the contract with the entity which represents a person	The processing is necessary for the performance of a contract or in order to take steps before entering into a contract (Article 6.1(b) of GDPR).	until the termination of the contract
Accounting and tax record keeping if the contract relates to business	The processing is necessary for compliance with a legal obligation (Article 6.1(c) of GDPR) in conjunction with Article 74 of the Accounting Act.	5 years from the beginning of the year following the fiscal year
Examination of complaints and requests	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests and good reputation of the Company.	until the limitation of claims
Debt collection	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company, material liquidity support.	until full settlement
Insurance coverage and reporting damage	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company in the event of damage, the right to insurance coverage and loss adjustment.	3 years after the date of the event
Establishing, redressing or defending against possible claims	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - establishing, redressing or defending against any reported claims as part of the measures taken before the initiation of proceedings, during court or enforcement proceedings, or in front of others authorities.	until the limitation of claims

## 7.2 Data recipients

The controller can transfer your data, to fulfil the obligations of the Company, only to trusted recipients, such as state authorities or other entities empowered by law, the providers of IT services, e-mail hosting, information systems, to entities providing insurance, postal, courier, transport, forwarding and financial services as well as legal and economic consultants (who provide services to the Company).

## 7.3 Data retention period

The controller is obliged to store documents containing personal data with the details of the contractor's representative throughout the contract and for the mandatory documentation retention period related to the above objectives, determined under separate regulations. In so far as the contractor's representative data is processed to pursue the legitimate interests of the Company - establishing, redressing or defending against any claims reported in court or enforcement proceedings, or before other state authorities - the Customer's data can be stored by the Company until the limitation of possible claims.

#### 7.4 Transfer of data to third countries

In the event of execution of order to provide international transport services are commissioned to be performed outside the territory of the European Union, and if it is necessary to meet the obligations under the concluded contract, your data (necessary for the execution of the order) will be transferred to third countries where GDPR does not apply. In such a case, other appropriate legal safeguards and guarantees will be applied to protect your personal data.

#### 7.5 Your rights

In view of the fact that the Company processes your personal data, you have the right of access to and rectification or erasure of your personal data (in case your data are incorrect) or restriction of processing or to object to processing as well as the right to data portability (for data to which processing the Customer has consented or which are processed based on contract). In so far as the processing of personal data is based on consent, the Customer has the right to withdraw consent at any time, without affecting the lawfulness of processing. If the processing of personal data by the Company is deemed to violate the provisions of GDPR, you have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

You have the right to object to the processing, the aim of which is the legitimate interest of the controller (Article 6.1(f) of GDPR). Each request to exercise the Customer's rights will be assessed and verified by the Company. The answer to the request will be provided immediately.

#### 7.6 The obligation to provide data

You are free to provide your personal data, but it is necessary to establish, build, change or terminate legal relationship between the Company and the contractor, to perform the contract between the Company and the contractor, and to settle the Company's business. Failing to provide your personal data will result in failure to establish, build, change or terminate legal relationship between the Company and the contractor, to perform the contract between the Company and the contractor, and to settle the Company's business.

### 8. Information for senders and recipients of transports (participants of the forwarding process)

#### 8.1 The purpose of and legal basis for processing

Purpose of processing	Legal basis for processing under the Regulation of the European Parliament and of the Council (EU) 2016/679 (GDPR).	Retention period
Keeping transport documentation	The processing is necessary for compliance with a legal obligation (Article 6.1(c) of GDPR in conjunction with Article 38 of the Transport Law, Article 6 of the Convention on the Contract for the International	5 years from the beginning of the year following the fiscal year

	Carriage of Goods by Road (CMR), and applicable local law on cabotage transport.	
<b>Accounting and tax record keeping</b>	The processing is necessary for compliance with a legal obligation (Article 6.1(c) of GDPR) in conjunction with Article 74 of the Accounting Act.	5 years from the beginning of the year following the fiscal year
<b>Insurance coverage and reporting damage</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company in the event of damage, the right to insurance coverage and loss adjustment.	3 years after the date of the event
<b>Establishing, redressing or defending against possible claims</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - establishing, redressing or defending against any reported claims as part of the measures taken before the initiation of proceedings, during court or enforcement proceedings, or in front of others authorities.	until the limitation of claims

## 8.2 Source and categories of data

We process only the usual categories of data (address, contact details), which come from the entities involved in the implementation of transport services: our principals.

## 8.3 Data recipients

The controller can transfer your data, to fulfil the obligations of the Company, only to trusted recipients, such as state authorities or other entities empowered by law, the providers of IT services, e-mail hosting, information systems, to entities providing insurance, postal, courier, transport, forwarding and financial services as well as legal and economic consultants (who provide services to the Company). The data is also transferred to the sender and recipient of the commissioned transport and any companies related personally and financially.

## 8.4 Data retention period

The controller is obliged to keep documents containing personal data throughout the mandatory documentation retention period related to the above objectives, determined under separate regulations. In so far as your data is processed for the implementation of legitimate interests of the Company, your data can be stored by the Company until the limitation of possible claims.

## 8.5 Transfer of data to third countries

In the event international transport services are commissioned to be performed outside the territory of the European Union, your data (necessary for the execution of the order) will be transferred to third countries where GDPR does not apply. In such a case, other appropriate legal safeguards and guarantees will be applied to protect your personal data.

## 8.6 Your rights

In view of the fact that the Company processes your personal data, you have the right of access to and rectification or erasure of your personal data (in case your data are incorrect) or restriction of processing or to object to processing as well as the right to data portability (for data processed based on contract). If the processing of personal data by the Company is deemed to violate the provisions of GDPR, you have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

You have the right to object to the processing, the aim of which is the legitimate interest of the controller (Article 6.1(f) of GDPR).

## 8.7 The obligation to provide data

You are free to provide your personal data, but it is necessary to conclude the contract, perform the contract and settle the operations. Failing to provide personal data will result in failure to conclude or perform the contract.

## 9. Information for drivers involved in the forwarding process

### 9.1 The purpose of and legal basis for processing

Purpose of processing	Legal basis for processing under the Regulation of the European Parliament and of the Council (EU) 2016/679 (GDPR).	Retention period
<b>Organization of transport - notification, driver identification at the point of loading and unloading the shipment.</b>	The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (client, sender, recipient) (Article 6.1(f) of GDPR) - improving the forwarding service, preventing damage and ensuring the safety of entrusted property.	until the limitation of claims
<b>Insurance coverage and reporting damage in case of damage</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - promoting the interests of the Company in the event of damage, the right to insurance coverage and loss adjustment.	3 years after the date of the event
<b>Establishing, redressing or defending against possible claims</b>	The processing is necessary for the purposes of the legitimate interests of the controller (Article 6.1(f) of GDPR) - establishing, redressing or defending against any reported claims as part of the measures taken before the initiation of proceedings, during court or enforcement proceedings, or in front of others authorities.	until the limitation of claims

### 9.2 Source and categories of data

We process only the usual categories of data (full name, identification card number, personal identification number, telephone number), which come from companies participating in the performance of transport services, such as your employer, carrier commissioning the service, and from companies related personally and financially.

### 9.3 Data recipients

The controller can transfer your data, to perform the obligations of the Company, only to trusted recipients such as state authorities or other entities empowered by law, the providers of IT services, e-mail hosting, information systems, to entities providing insurance, postal, courier, transport, forwarding, entities handling distribution hubs, entities handling shipment release and collection, legal consultants (who provide services to the Company). The data is also transferred to the sender and recipient of the commissioned transport and any companies related personally and financially.

#### 9.4 Data retention period

The controller is obliged to keep documents containing personal data throughout the mandatory documentation retention period related to the above objectives, determined under separate regulations. In so far as your data is processed for the implementation of legitimate interests of the Company, your data can be stored by the Company until the limitation of possible claims.

#### 9.5 Transfer of data to third countries

In the event international transport services are commissioned to be performed outside the territory of the European Union, your data (necessary for the execution of the order) will be transferred to third countries where GDPR does not apply. In such a case, other appropriate legal safeguards and guarantees will be applied to protect your personal data.

#### 9.6 Your rights

In view of the fact that the Company processes your personal data, you have the right of access to and rectification or erasure of your personal data (in case your data are incorrect) or restriction of processing or to object to processing as well as the right to data portability (for data processed based on contract). If the processing of personal data by the Company is deemed to violate the provisions of GDPR, you have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

You have the right to object to the processing, the aim of which is the legitimate interest of the controller (Article 6.1(f) of GDPR).

### 10. Information for job candidates

#### 10.1 Consent to data processing

By clicking the "Apply", "Apply Now" button or otherwise sending a recruitment notification to the Company\*, you grant your consent to the processing of your personal data in order to carry out the recruitment process for the position for which you applied.

If you want your personal data to be used by the Company also in the FUTURE RECRUITMENT PROCESSES, please include in your CV the following clause: ***"I hereby grant my consent to process my personal data provided in the recruitment application for the purposes of recruitment processes conducted by Simple Way Sp. z o.o. Sp. k."***

#### 10.2 Information on the processing of your personal data

##### 10.2.1 The objectives, legal basis, data retention period

Purpose of processing	The scope of data	Legal basis for processing under the Regulation of the European Parliament and of the Council (EU) 2016/679 (GDPR).	Retention period



<b>Conducting the recruitment process for the position for which you are applying</b>	The scope of the data provided for in Article 22 of the Act of 26 June 1974 Labour Code (Journal of Laws, item 917, as amended) and § 1 of the Regulation of the Minister of Labour and Social Policy of 28 May 1996 on the scope of conduct by documentation of employers in matters relating to employment and the conduct of the employee's personal files (Journal of Laws of 2017, item 894, as amended);	The processing is necessary for the performance of a contract or in order to take steps before entering into a contract (Article 6.1(b) of GDPR).	until filing objection to processing / requesting to erase the data / 6 months after the end of the recruitment process
	Other data given by you, including contact details	The legal basis of data processing will be your consent (Article 6.1(a) of GDPR).	until the withdrawal of consent / 6 months after the end of the recruitment process
<b>Conducting future recruitment, if you granted your consent to the processing of personal data for this purpose</b>	All data given by you, including contact details.	The legal basis of data processing will be your consent (Article 6.1(a) of GDPR).	until the withdrawal of consent, no longer than a year
<b>Establishing, redressing or defending against possible claims</b>	After erasing the application documents: Full name, the recruiter's notes, the history of the recruitment relationship: the date of the scheduled meetings and discussions held.	The processing is necessary for the purposes resulting from the legitimate interests of the controller (Article 6.1(f) of GDPR) - determining, investigating or defending against claims reported within the framework of the measures taken before the initiation of proceedings, in court or enforcement proceedings, or in front of others authorities.	until the limitation of claims, no longer than 3 years

The Company will process your personal data in the scope indicated by the provisions of the labour law in order to carry out the recruitment process for the position to which you apply (Article 6.1(b) of GDPR), while additional data, including contact details, on the basis of consent (Article 6.1(a) of GDPR), which may be revoked at any time. The application documents sent will be removed six months after the completion of the recruitment process. In the event you consented to the processing of personal data for the purpose of future recruitment, the data will be processed until you withdraw your consent, no longer than one year from the end of the recruitment process. The Company will process your data within a minimized scope in order to establish, redress or defend against legal claims (Article 6.1(f) of GDPR) for a period of limitation of



possible claims, but no longer than 3 years, unless during this time the Company receives information about the claims.

### **10.2.2 Data recipients**

The data will be made available to the law firm providing legal services and entrusted to providers and hosting services.

### **10.2.3 Your rights**

You have the right to access your personal data, request their rectification, erasure, restriction of processing, object to processing, and the right to data portability (for the date processed based on consent). In so far as the processing of personal data is based on consent, you have the right to withdraw your consent at any time without affecting the lawfulness of the processing conducted before the withdrawal of consent. If the processing of personal data by the Company is deemed to violate the provisions of GDPR, you have the right to lodge a complaint with a supervisory authority (President of the Personal Data Protection Office).

Providing personal information to the extent specified in the provisions of the Labour Code and implementing acts is necessary for the recruitment process and has been prescribed by law. Failing to provide such data will lead to the failure to examine your candidacy in the ongoing recruitment process. You are free to provide additional personal data.

You can withdraw your consent at any time. To do so, please send an e-mail to [rodo@simpleway.com.pl](mailto:rodo@simpleway.com.pl)

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