

INFORMATION OBLIGATION CLAUSE INCLUDING INFORMATION ON THE PROCEDURE FOR REPORTING IRREGULARITIES AND CONDUCTING EXPLANATORY PROCEEDINGS

Synthos S.A.

Synthos Dwory 7 spółka z ograniczoną odpowiedzialnością

1. Personal data controller

Your personal data controller is **Synthos S.A.** with its registered office in Oświęcim 32-600 at ul. Chemików 1, entered into the register of entrepreneurs kept by the District Court for Kraków Śródmieście in Kraków, 12th Commercial Division of the National Court Register under the KRS number 0000038981, assigned the REGON [National Official Business Register] number 070472049, NIP [Tax ID No.] 5490002108, share capital: PLN 39 697 500,00 and **Synthos Dwory 7 spółka z ograniczoną odpowiedzialnością** with its registered office in Oświęcim 32-600 at ul. Chemików 1, entered into the register of entrepreneurs kept by the District Court for Kraków Śródmieście in Kraków, 12th Commercial Division of the National Court Register under the KRS number 0000986984, assigned the REGON [National Official Business Register] number 260133662, NIP [Tax ID No.] 9591762828, share capital: PLN 162 970 000,00. You can contact the data Controller using the correspondence details or by e-mail sent to the following address: synthos-pl@synthosgroup.com.

2. Data Protection Officer

Synthos S.A. and Synthos Dwory 7 spółka z ograniczoną odpowiedzialnością as the personal data Controllers, in order to properly protect personal data, have appointed a Data Protection Officer, who can be contacted at the following e-mail address: dpo@synthosgroup.com.

3. The purpose and legal basis for processing personal data

Your personal data will be processed solely for the purpose of:

a) carrying out the recruitment process, including recruitment activities aimed at selecting candidates for work, in particular pursuant to:

- Art. 6 paragraph 1 letter b of the GDPR – i.e. in order to undertake activities at the request of the data subject before concluding an agreement;
- Art. 6 paragraph 1 letter c of the GDPR – to meet the requirements under applicable legal provisions, within the scope of exercising the employer's rights resulting from Art. 221 § 1 of the Labour Code;
- Art. 6 paragraph 1 letter a of the GDPR - consent that may be withdrawn at any time if you provide data in the recruitment application in a broader scope than the one the data controller is authorised to process under the Labour Code, and Art. 9 paragraph 2 letter a of the GDPR, in the case of data of special category. Voluntary submission of personal data in the recruitment process constitutes an expression of consent (consent granted by explicit confirming activity);
- Art. 6 paragraph 1 letter a - data processing for the purpose of carrying out future recruitment processes in the Talent Pool based on your voluntary consent;
- Art. 6 paragraph 1 letter f of the GDPR - the legitimate interest pursued by the Controller, i.e. to send information messages regarding the ongoing recruitment process and to conduct an assessment survey of the ongoing recruitment process, the purpose of which is to improve the quality of the recruitment processes conducted by the data Controller.

b) determination, pursuing or defence against potential claims between you and the Controller pursuant to Article 6 paragraph 1 letter f of the GDPR.

c) in the case of taking part in the recruitment process (regardless of the recruitment process selected), your personal data may also be processed for the purposes of personnel administration in the group of companies, in particular for the purpose of implementing operational activities in the field of planning and HR policy (employment planning in the Synthos Group, budget planning, etc.) – pursuant to Article 6 paragraph 1 letter f of the GDPR.

Providing personal data is voluntary, however, failure to provide personal data specified in Article 22¹ § 1 of the Labour Code will cause that the application documents received from job candidates will not be considered by the data Controller.

4. Recipients of personal data

Personal data will be made available to authorised employees and entities participating in the recruitment process.

Personal data will be transferred to other entities that:

- a) are entitled to obtain them under applicable law;
- b) provide the Controller with services that require access to data, such as:
 - recruitment agencies - only in specific cases;
 - websites via which the Controller publishes job advertisements, as well as entities that design software used to submit applications and conduct the recruitment process, cooperating with the Controller under relevant personal data processing agreements, subject to application by the above-mentioned entities adequate technical and organisational measures to ensure data protection;
 - entities providing services in the field of conducting recruitment tests.;
 - entities belonging to the same SYNTHOS Group of companies, as well as MS Galleon AG with its registered office in Vienna and Black Forest Sicav Sif Société Anonyme with its registered office in Luxembourg - based on recital 48 of the GDPR - in order to enable participation in the recruitment process to the extent provided for in internal procedures (personal administration in the Synthos Group);
 - FTF Columbus Sp. z o.o. – based on the concluded personal data processing entrustment agreement;
 - other entities providing services related to the current activities of the Controller - based on concluded personal data processing entrustment agreements subject to application by the above-mentioned entities adequate technical and organisational measures to ensure data protection;

or to other recipients who are included in the scope of the consent you granted.

Your personal data will not be transferred to a third country or an international organisation outside the European Economic Area. In some situations, in view of cooperation of the Controller with service providers in the implementation of the purposes of personal data processing, personal data may be transferred to countries outside the European Economic Area, however, where this is the case, the Controller will ensure that all formalities related to the proper protection of personal data are maintained, including, *inter alia*, by application of standard contractual clauses adopted by the Commission (EU).

5. The period of storage of personal data

Your personal data will be stored until the end of a given recruitment process, but no longer than for a period of 12 months from the date of sending the personal data, and after this period for the purposes of future recruitment for a period of 12 months and to the extent required by law or to secure any claims and until their storage limitation period expires, i.e. for a period of 3 years.

6. Rights of data subjects

You have the following rights related to the processing of personal data by the Controller:

- the right to request access to the content of your data;
- the right to rectify your personal data;
- the right to delete your personal data ("to be forgotten");
- the right to limit the processing of data by the Controller;
- the right to transfer data, including receiving from the Controller - in a structured, commonly used format - the data provided to the Controller, if the basis for processing was the consent of the data subject (Article 6 paragraph 1 letter a of the GDPR or Article 9 paragraph 2 letter a of the GDPR), or the processing of data is necessary for the performance of an agreement to which the data subject is a party or to take action at the request of the data subject before entering into such an agreement (Article 6 paragraph 1 letter b of the GDPR). This right is also granted when the processing is carried out in an automated manner;
- the right to object to the processing of personal data when their processing is based on legitimate interests pursued by the Controller (Article 6, paragraph 1, letter f of the GDPR);
- the right to withdraw consent to the processing of your data at any time if the processing is based on consent to the processing of data (Article 6 paragraph 1 letter a of the GDPR or Article 9 paragraph 2 letter a of the GDPR), without affecting the lawfulness of processing based on consent before its withdrawal.

7. The right to lodge a complaint with the Supervisory Authority

In view of the processing of your personal data by the Controllers, you have the right to lodge a complaint, at any time, with a supervisory authority - the President of the Personal Data Protection Office, if you consider that the processing of your personal data violates the provisions of the GDPR. Detailed information on the right to complain is available on the website at: <https://uodo.gov.pl/pl/83/155>.

8. Profiling

Synthos S.A. and Synthos Dwory 7 spółka z ograniczoną odpowiedzialnością as the Controllers do not make decisions regarding the processing of your personal data based on automated processing, including profiling.

9. Information on the procedure for reporting irregularities and conducting explanatory proceedings

We hereby inform you that the *Procedure for Reporting Irregularities and Conducting Explanatory Proceedings* has been implemented in Synthos S.A. and Synthos Dwory 7 spółka z ograniczoną odpowiedzialnością and other companies belonging to the Synthos capital group. Notifications can be reported via the platform made available at www.zalezynam.eu or another convenient channel in accordance with the content of the procedure available on the platform.

By clicking the "Send form" button, you confirm that you have read the above information and agree to the processing of your personal data by the Controller for the purpose of conducting recruitment. Your consent is voluntary and can be withdrawn at any time.