

PRIVACY POLICY

1. INTRODUCTORY INFORMATION

- 1.1 This Privacy Policy explains how we at **BridgeBoard s.r.o.** (with registered office at Evropská 2758/11, 160 00 Prague, ID: 17846374, registered in the Commercial Register of the Municipal Court in Prague, Section C, File No. 376466 (the "**Company**" or "**we**") treat your personal data when we are helping you to find a job, working with you after we have found an employment for you, providing you with services, accepting services from you, or requesting your cooperation concerning a candidate.
- 1.2 The Privacy Policy describes the method of collecting, using and processing your personal data, as well as the manner in which we, as the controller of your personal data, fulfill our legal obligations to you to comply with applicable laws governing the protection of personal data (namely Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter the "**GDPR Regulation**").
- 1.3 This Privacy Policy applies to candidates, clients, contractors, and other persons whom we may contact to obtain additional information about candidates. Please refer to Article 2 below for further information on whom we consider a candidate, a client or a contractor.
- 1.4 All your comments or suggestions regarding this Privacy Policy can be communicated to us in ways set forth in Article 10 below.

2. CLARIFICATION OF CERTAIN TERMS

- 2.1 **Candidates** - job seekers applying for jobs offered or promoted by the Company, including full, part-time and temporary employment offers as well as self-employed individuals hired to meet certain obligations vis-à-vis Company clients, and finally individuals who speculatively send CVs to the Company without applying to a specific job position.
- 2.2 **Clients** - persons to whom the Company provides its services within the scope of its business, generally employers and prospective employers.
- 2.2 **Contractors** - persons who provide their services to the Company. Under certain circumstances, the Company may outsource services they provide to their clients to a third party (such as external consultants). In this case, these third parties provide services to clients on behalf of the Company.

3. WHAT PERSONAL DATA DO WE COLLECT?

3.1 Candidate data

3.1.1 In order to offer you job opportunities that correspond to your interests and are a good match for your experience and qualifications, it is necessary for us to collect certain kinds of personal data.

3.1.2 Depending on the specific situation, especially with regard to the nature of the job or role you are applying for, we may collect some or all of the data listed below in order to offer you job opportunities corresponding to your expectations and interests:

- name,
- age/date of birth,
- gender,
- photo,
- marital status,
- contact information,
- educational background,
- work experience,
- information about people who can provide references for you,
- nationality / citizenship / place of birth,
- details of your current salary or retirement conditions and benefits,
- information about your interests and needs in terms of future employment, and
- additional information that you may share with us during the recruitment process.

3.2 Client data

The amount of data we collect about clients is very limited. In general, we need your contact information or details about people of contact in your organization (i.e. their names, phone numbers and e-mail addresses) in order to ensure smooth cooperation. We may also keep additional information that a member of your organization has chosen to share with us.

3.3 Contractor data

Regarding contractors, we collect only information that we need to ensure smooth cooperation. We collect contact information about people of contact in your organization, such as their names, phone numbers, and email addresses. We also collect bank details in order to be able to make payments to you.

3.4 Data on people providing references for candidates

Concerning those who provide references for candidates, we only verify the information we already have about candidates so that we can offer the candidates a job they are really

interested in and for which they have the necessary prerequisites. In order to verify the references, we need contact details of the reference providers (in particular their name, e-mail address and telephone number).

4. HOW DO WE COLLECT PERSONAL DATA?

4.1 Candidate data

4.1.1 We collect personal data about candidates directly from the candidates.

4.1.2 As a candidate, you can share your data with us in different ways. The choice is up to your preference. For instance, the sharing may take place as follows:

- (a) You can leave us a printed version of your CV during one of our recruiting events, at a trade fair, or at our office.
- (b) You can send your CV by e-mail, hand it in printed form to the Company's consultant, or hand it to him or her during an interview.
- (c) You can share your personal data with us or submit it to us in written form during your interview with our consultant.

4.2 Client data

4.2.1 We collect the clients' personal data in these two following ways:

- personal data that you provide us directly, and
- personal data we obtain from other sources.

4.2.2 Personal data you provide us directly

We usually obtain data from you by the following means:

- (a) when you contact us proactively, typically by phone or e-mail and / or
- (b) when we contact you, for instance by phone or e-mail in accordance with common market practice.

4.2.3 Personal data we obtain from other sources

We may, depending on circumstances, search for information about you from other sources. These include market research performed by third party, online or offline media analyses (which we can do by ourselves or through hired organizations), lists of delegates sent to relevant events, and information from other sources or third parties.

4.3 Contractor data

4.3.1 We collect contractors' personal data directly from the contractors.

5. HOW DO WE USE YOUR PERSONAL DATA?

5.1 Candidate data

5.1.1 We use candidate data for:

- recruitment activities, and

- establishing, exercising and/or defending our legal claims.

5.1.2 Recruitment activities:

Our main activity consists of recruiting and offering the most relevant job opportunities to the most suitable candidates. The manners in which we use and process your personal data for the described purposes are listed below. Please note that the list is not exhaustive.

- (i) We collect data directly from you.
- (ii) We keep the data in our database (which we update as needed) so that we can contact you regarding our recruitment activities.
- (iii) We review your data when assessing job vacancies that we consider appropriate for you.
- (iv) When applying for a job or when assessing your suitability for different jobs, we forward your data to clients.

5.1.3 Establishing, exercising and/or defending legal claims

Under less common circumstances we may also use your personal data to establish, exercise and/or defend our legal claims.

- 5.1.4 By using the methods described above, we may use your data when we believe it is necessary to fulfill our legitimate interests. In order to learn more information, please read Articles 9.1 and 9.1.2 below. If you are not happy about this, in certain circumstances you have the right to object. For a detailed description of the procedure, please refer to Article 8.3 below.

5.2 **Client data**

5.2.1 We use our client data for:

- recruitment activities, and
- establishing, exercising and/or defending our legal claims.

5.2.2 Recruitment activities

Our main activity consists of recruiting employees through the process of candidate selection. Please see below a list of ways we use your data when carrying out our main activities.

- (i) We keep the data in our database (which we update as needed) so that we can contact you about our recruitment activities.
- (ii) We keep records of our interviews and meetings so that we can provide you with customized services.
- (iii) We fulfill our obligations derived from a contract concluded and signed with you.
- (iv) We conduct customer satisfaction surveys.

5.2.3 Establishing, exercising and/or defending legal claims

Under less common circumstances we may also use your personal data to establish, exercise and/or defend our legal claims.

- 5.2.4 By using the methods described above, we may use your data when we believe it is necessary to fulfill our legitimate interests. In order to learn more please read Articles 9.1 and 9.1.3

below. If you are not happy about this, in certain circumstances you have the right to object. For a detailed description of the procedure, please refer to Article 8.3 below.

5.3 **Contractor data**

5.3.1 We will use your data in the following ways:

- (a) We will keep your data in our database (which we update as needed) so that we can get in touch with you regarding services we agreed on.
- (b) When requesting your support and services.
- (c) When fulfilling our legal obligations.

5.3.2 Under less common circumstances we may establish, exercise and/or defend our legal claims. We may use your data in these ways when we believe it is necessary to fulfill our legitimate interests. In order to learn more, please read Articles 9.1 and 9.1.4 below.

5.3.3 If you are not happy about this, in certain circumstances you have the right to object. For a detailed description of the procedure, please refer to Article 8.3 below.

5.4 **Data on persons providing references about candidates**

5.4.1 We will use your personal data, provided to us by a candidate, exclusively in order to verify the references submitted by the candidate. It is an important part of the process of checking

the qualities of candidates, the outcome of which can have an important influence on the success or failure of a particular candidate.

5.4.2 By using the methods described above, we may use your data when we believe it is necessary to fulfill our legitimate interests. In order to learn more please read Articles 9.1 and 9.1.5 below.

5.4.3 If you are not happy about this, in certain circumstances you have the right to object. For a detailed description of the procedure, please refer to Article 8.3 below.

6. TO WHOM DO WE PROVIDE PERSONAL DATA?

6.1 We may, depending on circumstances, provide your personal data to the following categories of individuals:

(a) Public authorities, if we are obliged by law to provide personal data (for example, at the request of a tax office or in connection with court proceedings).

(b) Third parties who perform some of our functions as external service providers (including external consultants, business partners and expert advisors such as lawyers, auditors, accountants, technical support staff, and IT consultants testing or developing our operating technology systems).

(c) Third parties that provide us with IT services or ensure the storage of our documents, and with whom we have a relevant data processing contract (or similar agreement).

6.2 We will also provide potential employers with the personal data of the candidates for the purpose of offering job opportunities to the candidates.

7. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

7.1 If we have not been in significant contact with you, or the company with which or for which you work, for two (2) years, we will remove your personal data from our systems. After this period, it is likely that your data will no longer be relevant for the purposes for which we obtained it.

7.2 "Significant contact" means, for example, oral or written communication we maintain with you, or instances when you actively use our services. In case you are a candidate, we will consider a significant contact those cases in which you provide us with your current CV or you participate in our online training. Significant contact will also mean the communication about potential positions, be it oral, written or electronic means of communication.

8. HOW CAN YOU ACCESS THE PERSONAL DATA WE HAVE COLLECTED ABOUT YOU, AND WHAT ARE YOUR PROCESSING RIGHTS?

8.1 One of the main objectives of the GDPR Regulation is to protect and clarify the rights of EU citizens and individuals in the EU concerning the personal data protection. It means that you have certain rights with respect to your data even after you provide them to us. A detailed description of these rights is provided below in this Article 8.

8.2 We will handle your requests regarding the protection and processing of your personal data without undue delay, and in any case we will resolve them within one month (this period may be extended in accordance with applicable law). Please note that we are taking records of

your communication with us to ensure a smooth and efficient resolution of any problems you may have.

8.3 Right to object

8.3.1 This right means that you may object to the processing of your personal data, that we perform for some of the following reasons: (i) in order to fulfill our legitimate interests, (ii) to meet the public interest or to support the activities of the authorities, and (iii) scientific or historical research purposes or statistical purposes.

8.3.2 Candidates, clients and contractors are likely to be primarily concerned with the above-mentioned issue related to "legitimate interests". If your objection concerns our processing of your personal data, which we consider necessary to fulfill our legitimate interests, we are obliged to respond to your objection by ending the processing of your personal data. Exceptions include cases when:

(a) we can prove that there are compelling legitimate reasons for processing data that override your interests or

(b) we process your data for the purpose of establishing, exercising and/or defending legal claims.

8.4 Right to revoke consent to the use of personal data

8.4.1 If we have obtained your consent to the processing of personal data with regards to certain activities (e.g. related to marketing), you may withdraw this consent at any time and we will end the particular activity you have previously agreed to. Exceptions are cases in which we believe that there is an alternative reason for further processing of your data for a certain purpose, this is a circumstance we will inform you about.

8.5 Requirements for access to personal data

8.5.1 You can learn what kind of data we keep about you anytime. At the same time, you can ask that we modify, correct, update or delete your data. We may verify your identity and ask for further specification of your request. Any access to the data we hold about you will not be charged unless it is "manifestly unreasonable or unjustified". Asking for the provision of additional copies of such data by us may be subject to the obligation to pay a reasonable

administrative fee if permitted by law. In accordance with applicable law we may, in similar cases, reject your application. If this happens, we will always provide you with our reasons.

8.6 The right to deletion of personal data

8.6.1 Under certain circumstances, you have the right to request the deletion of your personal data. These are cases where:

- (a) data is no longer needed for the purposes for which they were originally obtained and/or processed,
- (b) your previous consent to processing of your data has subsequently been revoked and there is no valid reason for further processing- this reason for deletion applies only to cases where your consent constitutes the legal basis for the processing of your personal data,
- (c) data was processed in violation of applicable law (e.g. in a manner not in accordance with the GDPR Regulation),
- (d) data must be deleted in order to comply with our statutory obligations as an administrator, or
- (e) we process the data because we believe that we are pursuing our legitimate interests, you object to their processing and we cannot prove that there are overriding legitimate reasons for their further processing.

8.6.2 We are authorized to reject your request only in one of the following cases:

- (a) to exercise our right of freedom of expression and information,
- (b) to fulfill our legal obligations or to promote the public interest, or to support activities of authorities,
- (c) in order to protect public interest in the area of public health,
- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, or
- (e) to establish, exercise and/or defend our legal claim.

8.6.3 If we comply with a valid deletion request, we will take relevant and practicable measures to delete the pertinent data.

8.7 Right to limit personal data processing

8.7.1 Under certain circumstances, you have the right to request that we limit the processing of your personal data. In such cases, we may only keep your data and may not process it further unless (i) the relevant circumstance is no longer applicable, (ii) you further express your consent, or (iii) further processing is necessary to establish, exercise and/or defend our legal

claims, the protection of the rights of another person or of an important public interest of the EU or its Member State.

8.7.2 The circumstances in which you are entitled to request a limitation on the processing of your personal data include:

- (a) Cases where you contest the accuracy of your personal data we process. If this is the case, we will limit the processing of your personal data until we verify its accuracy.
- (b) Cases where you object to our processing of your personal data in order to promote our legitimate interests. If this is the case, you may require limitation on the processing of your personal data until we verify our reasons for processing.
- (c) If our processing of your data is unlawful and you request limited processing instead of deletion.
- (d) If we no longer need to process your personal data, but you need the data for the establishment, exercise or defence of legal claims.

8.7.3 If we have provided your data to third parties under the outlined circumstances, we will inform them about your request for processing limitations. Exceptions are cases where this would be impossible or require disproportionate effort. We will inform you about any ending of the limitation on the processing of your personal data.

8.8 **Right to rectification**

8.8.1 You also have the right to request the rectification of any inaccurate or incomplete personal data we keep about you. If we have provided your data to third parties in such circumstances, we will inform those parties about your request for data correction. Exceptions are cases where this would be impossible or require disproportionate effort. If required, we will inform you which third parties were provided with inaccurate or incomplete personal data. If we believe that it is legitimate for us not to comply with your request, we will give you the reasons for such a decision.

8.9 **Right to file a complaint with the supervisory authority**

8.9.1 You have the right to file a complaint with the supervisory authority. For a detailed description of how you can contact the authority, please see Article 11 below.

8.10 **Common provisions**

8.10.1 If you wish to exercise any of these rights or if you wish to withdraw your consent to the processing of your personal data (where consent is the legal basis for the processing of your personal data), please refer to Article 10 below for a detailed description of how you can contact us.

8.10.2 It is important that your personal data we keep is accurate and up to date. Please keep us therefore informed of any changes during the period we keep your data.

9. **THE LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA BY OUR COMPANY**

9.1 **Legitimate interests**

9.1.1 Article 6 (1) (f) of the GDPR Regulation provides that we may process your data if it is necessary for the legitimate interests of our Company or a third party, except where such interests are

overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

9.1.2 Candidate data

(a) We assume that when you seek our help or services when applying for a job, you are happy for us to collect and use information you provide us so that we can offer our recruitment services, share the obtained information with prospective employers and, where appropriate, use them to assess your skills in relation to our database of vacancies. If it becomes likely that you will get the job, your potential employer may want to re-check the data you have provided (such as the skill test) or asks for verification of your references or qualifications. These activities are necessary so that we can carry out our business activities successfully in the long run, thanks to which we can help you and other job seekers find the job you deserve.

(b) We endeavor to ensure that our business runs smoothly, so that we can continue to provide services to candidates like you. For this reason, we also need to use your data in our internal administrative activities such as payroll accounting and invoicing.

(c) It is our legitimate interest to carry out our business activities in accordance with applicable legal regulations. Under applicable law, it may be our duty to provide your personal data to relevant third parties in connection with criminal investigations, tax collection, and ongoing or expected legal proceedings.

(d) We consider our legitimate interests also the cases in which we process personal data for the purpose of establishing, exercising and/or defending our legal claims to the extent necessary to achieve that purpose. Such a situation can occur, for example, if we need legal advice in court proceedings.

9.1.3 Client data

(a) In order to provide you with the best quality services, we keep your personal data and/or personal data of contact persons from your organization and records of your communication, meetings, previous and current positions and functions. Sometimes we can also ask you to participate in a customer satisfaction survey. We are convinced that the way we use your data is reasonable for the necessary fulfillment of legitimate interests of our company as an organization providing a wide range of recruitment services.

(b) We consider our legitimate interests also the cases in which we process personal data for the purpose of establishing, exercising and/or defending our legal claims to the extent necessary to achieve that purpose.

9.1.4 Contractor data

(a) We use and keep personal data about individuals from your organization in order to make it easier to receive the services your company, as one of our suppliers, provides. At the same time, we keep your financial data so that we can pay for the services you provide to us. As a recipient of your services, we consider all these activities necessary and appropriate to our legitimate interests.

(b) We consider our legitimate interests also the cases in which we process personal data for the purpose of establishing, exercising and/or defending our legal claims to the extent necessary to achieve that purpose.

9.1.5 Data on people providing references for candidates

If a candidate mentions you as a person of reference, we will use your personal data to contact you to verify the reference. It is part of our quality assurance procedures that we, as a recruiting organization, consider necessary to assert our legitimate interests and necessary to employ people in our Company.

9.2 Consent

9.2.1 If we want to process your personal data in cases where your consent is required (e.g. for marketing purposes), we would draw your attention to this and ask for your explicit consent in advance.

9.2.2 Article 4 (11) of the GDPR Regulation provides that consent means "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her". In common language, this means that:

- (a) you have to give us your consent freely without us exerting any pressure on you,
- (b) you need to know what you are giving your consent to, therefore we need to provide you with enough information,
- (c) you should have control over what types of data processing you agree with and what types of data processing you do not agree with,
- (d) you should express your consent explicitly and positively- usually by ticking a check box to ensure a clear fulfillment of this requirement.

9.2.3 We will keep records of consents we obtain from you.

9.2.4 As we have already mentioned, in cases where we process your personal data with your consent, you have the right to revoke your consent at any time.

10. HOW TO CONTACT US:

If you wish to:

- (a) gain access to the personal data you have provided us, change the data or revoke your consent to their use,
- (b) if you suspect abuse, loss or unauthorized access to your personal data,
- (c) revoke your consent to the processing of your personal data (in cases where consent constitutes the legal basis for the processing of your personal data),
- (d) if you have any comments or suggestions regarding this Privacy Policy, you can write to us via the following address: Evropská 2758/11, 160 00 send an email to: office@bridgeboard.net.

11. HOW CAN YOU CONTACT THE LOCAL SUPERVISORY AUTHORITY?

11.1 Your supervisory authority is: Úřad pro ochranu osobních údajů (*The Office for Personal Data Protection*). You can use the following contact options:

Phone: (+420) 234 665 111
Email: posta@uoou.cz
Postal address: Úřad pro ochranu osobních údajů (*The Office for Personal Data Protection*), Pplk. Sochora 27, Prague 7, 170 00
Fax: (+420) 234 665 444

12. ENTERING INTO FORCE

This Privacy Policy becomes effective 25. 5. 2018.