

Privacy Policy

Appunite

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This Privacy Policy (“**Policy**”) provides information about the processing of your personal data in connection with the use of the Websites

1. Definitions

1.1. Personal Data Controller – Appunite Spółka Akcyjna with its registered office in Poznań (61-555) at 3A/3 Droga Dębińska entered in the register of entrepreneurs of the National Court Register kept by the District Court Poznań – Nowe Miasto and Wilda in Poznań, VIII Economic Department of the National Court Register, under KRS number: 0000964739, NIP 7831812112, REGON 385381222 (hereinafter: “Controller”).

Contact with the Controller

In all matters related to the processing of personal data, you can contact the Controller by e-mail – at: dpo@appunite.com, or by post – at: Appunite SA, Droga Dębińska 3a/3 Street, 61-555 Poznań, Poland.

1.2. GDPR – Data Protection Measures – the Controller uses modern organizational and technical measures to ensure the best possible protection of your personal data and ensures that it processes it in accordance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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: “GDPR”).

1.3. Personal data – information about an identified or identifiable natural person (“data subject”). An identifiable natural person is a person who can be identified directly or indirectly, in particular on the basis of an identifier such as a name, an identification number, location data, an online identifier or one or more specific factors that determine the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

1.4. Policy – this Privacy Policy.

1.5. Website – the Internet service operated by the Controller at the following addresses: <https://appunite.com/>, <https://jobs.appunite.com/>.

1.6. User – any natural person visiting the Service or using one or more services or functionalities described in the Policy.

2. What information do we collect?

2.1. Processing of Personal Data in connection with the use of the Website

In connection with the User's use of the Website, the Controller collects data to the extent necessary to provide the various services offered. The detailed principles and purposes of the processing of personal data collected during the User's use of the Website are described below.

Purpose of processing	Personal data processed	Legal basis
By voluntarily participating in your obtaining information about us or our products and services, or by participating in activities on the websites, posting messages on our forums, or contacting us viaelectronic forms	<ul style="list-style-type: none"> ● first and last name; ● e-mail address; ● telephone number; ● address: street name, house number, postal code. <p>Optional – company, tax identification number and business address.</p>	<p>Article 6(1)(a) of the GDPR the data subject has consented to the processing of his/her personal data for one or more specified purposes.</p> <p>Article 6(1)(b) GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Article 6(1)(f) GDPR processing is necessary for the purposes of legitimate interests</p>

		pursued by the controller.
<p>Provision of the aforementioned personal data is voluntary, but the consequence of not providing the data is the inability to participate in competitions, post messages on forums or obtain a response to an inquiry sent via an electronic form. The Controller will process the above personal data until the consent is withdrawn and until the expiry of the limitation period of claims.</p>		
<p>By participating in the recruitment process</p>	<ul style="list-style-type: none"> ● first name(s) and last name; ● date of birth; ● contact information; ● education; ● professional qualifications; ● history of previous employment. 	<p>Article 6(1)(b) GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6 (1)(c) GDPR processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6 (1)(f) GDPR processing is necessary for the purposes of legitimate interests pursued by the Controller.</p>
<p>Provision of the aforementioned personal data is voluntary, but the consequence of not providing the data is the inability to participate in the recruitment process. The Controller will process the above personal data for a period of 3 months from the end of the recruitment process and until the expiry of the limitation period of claims. In case of hiring a person participating in the recruitment process, the Controller will process personal data for the period required by law, in particular in accordance with: Labor Code, Social Security System Act, Personal Income Tax Act.</p>		
<p>By agreeing to participate in future recruitment processes by sending us a</p>	<ul style="list-style-type: none"> ● professional experience; 	<p>Article 6 (1)(a) GDPR the data subject has consented to the</p>

<p>resume, cover letter, and filling out a recruitment form.</p>	<ul style="list-style-type: none"> ● skills, courses, certificates; ● health information; ● professional qualifications; ● e-mail address; ● telephone number; ● residential address; ● image; ● other data. 	<p>processing of his/her personal data for one or more specified purposes.</p> <p>Article 9 (1) (a) the data subject has expressly consented to the processing of such personal data for one or more specific purposes.</p> <p>Article 6 (1) (f) GDPR processing is necessary for the purposes of legitimate interests pursued by the controller.</p>
<p>Provision of the above personal data is voluntary. The Controller will process the aforementioned personal data for a period of 12 months from the end of the recruitment process and until the expiry of the limitation period of claims.</p>		
<p>For purposes related to the orders processing and the conclusion and performance of the contract, as well as for the performance of the obligations imposed on the Controller in connection with the concluded contract.</p>	<ul style="list-style-type: none"> ● first and/or second name and last name; ● PESEL number; ● position/function; ● registered office address; ● bank account number; ● registry data; ● e-mail address; ● telephone number 	<p>Article 6 (1) (a) GDPR the data subject has consented to the processing of his or her personal data for one or more specified purposes.</p> <p>Article 6 (1) (b) GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6 (1) (c) GDPR</p>

		<p>processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6 (1) (f) GDPR processing is necessary for the purposes of legitimate interests pursued by the controller.</p>
<p>Provision of the aforementioned personal data is voluntary, but necessary in order to process the order and/or conclude the contract. The Controller will process the above personal data for the duration of the contract, until the consent is withdrawn and until the expiry of the limitation period of claims, as well as for the period required by law in particular in accordance with: Personal Income Tax Act, Civil Code Act.</p>		
<p>For the purposes of meeting tax obligations (issuing a VAT invoice, keeping accounting records)</p>	<ul style="list-style-type: none"> ● name and surname/company name; ● address of residence/registered office; ● tax identification number (NIP) 	<p>Article 6 (1) (c) GDPR processing is necessary to fulfill a legal obligation of the Controller, in this case obligations under tax law.</p>
<p>Provision of the aforementioned personal data is voluntary, but necessary in order for the Controller to fulfill its tax obligations (the consequence of not providing the data will be the Controller's inability to fulfill the aforementioned obligations). The Controller will process the above mentioned personal data for a period of 5 years from the end of the year in which the deadline for payment of tax for the previous year expired.</p>		

<p>In order to send marketing and promotional information to the User</p>	<ul style="list-style-type: none"> • first and last name; • e-mail address. 	<p>Art. 6 (1) (b) GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6 (1) (f) GDPR processing is necessary for the purposes of the legitimate interests pursued by the controller.</p>
<p>The provision of data is voluntary. The Controller will process the above personal data until the consent is withdrawn and until the expiry of the limitation period of claims.</p>		
<p>In order to carry out surveys and research on User satisfaction, including providing feedback on the level of services provided by the Controller</p>	<ul style="list-style-type: none"> • first and last name; • e-mail address. 	<p>Art. 6 (1) (b) GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Art. 6 (1) (f) GDPR processing is necessary for the purposes of legitimate interests pursued by the Controller.</p>
<p>Provision of data is voluntary. The Controller will process the above personal data until the consent is withdrawn and until the expiry of the limitation period of claims.</p>		
<p>Conclusion and execution of the Newsletter Delivery Agreement</p>	<ul style="list-style-type: none"> • e-mail address 	<p>art. 6 (1) (b) GDPR processing is necessary for the performance of the Newsletter Delivery</p>

		<p>Agreement entered into with the data subject, or for taking steps to enter into the Agreement.</p> <p>art. 6 (1) (f) GDPR processing is necessary for the purpose of realizing the legitimate interests of the Controller, in this case to inform about news and promotions, services.</p>
<p>Provision of the aforementioned personal data is voluntary, but necessary in order to receive the Newsletter (the consequence of not providing such data will be the inability to receive the Newsletter). The Controller will process the aforementioned personal data until the consent is withdrawn or the purpose of the processing is achieved, or the expiry of the limitation period of claims arising from the Newsletter Delivery Agreement (whichever of the aforementioned events occurs first).</p>		
<p>Conducting the complaint procedure</p>	<ul style="list-style-type: none"> • first and last name; • e-mail address. 	<p>Art. 6 (1) (c) GDPR processing is necessary for compliance with a legal obligation to which the controller is subject, in this case obligations:</p> <ul style="list-style-type: none"> - to respond to a complaint - Article 7a of the Consumer Rights Act.
<p>Providing the above-mentioned personal data is a condition for receiving a response to the complaint. Provision of data is voluntary, but the consequence of not providing the data is the inability to file a complaint, and thus to exercise the consumer rights. The Controller will process the above personal data for the duration of the complaint procedure, as well as until the expiry of the limitation period of claims.</p>		
<p>Processing of data for statistical purposes</p>	<p>Anonymized data held by the Controller</p>	<p>Art. 5 (1) (e) GDPR Art. 89 (1) GDPR</p>

The Controller processes anonymized or pseudonymized data.

2.2. The data we collect may also include information

2.2.1 collected automatically: we collect certain information when the User visits, navigates and uses our Websites. This information does not reveal Users' specific identity, but may include device and usage information, such as an IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when User uses our Websites, and other technical information. The data collected in this way is needed primarily to maintain the security and operation of our websites and for our internal analytical and reporting purposes.

We also collect information through cookies and similar technologies, you can learn more about this in our [Cookie Policy](#).

2.2.2 collecting data from other sources: we may obtain information about User from other sources, such as public databases, registries, online platforms, shared marketing partners, and from third parties such as our customers, contractors, partners or associates. Examples of information we may receive from other sources include: social media profile information, marketing leads, search results and links, including paid offers such as sponsored links, basic data to represent the entity for the purpose of entering into a contract (name, position/function), contact information (email address, phone number).

3. The recipients of personal data will be the following trusted third parties who cooperate with the controller and process data under the controller's instructions:

- hosting companies;
- domain name providers;
- online payment system providers;

- mailing system providers;
- newsletter service providers;
- companies providing tools for activity analysis on the Website and for direct marketing to individuals using it (including but not limited to Google Analytics, Google Ads, Microsoft, Meta (Facebook));
- company providing accounting services.

In addition, personal data may also be transferred to public or private entities, if such an obligation arises from generally applicable laws, a final court judgment or a final administrative decision.

4. Sharing of the User data

4.1 We may share and disclose User data with the following entities, categorized as follows:

- **advertising, direct marketing, lead generation:** Facebook, Audience Network, Sendgrid, Woodpecker;
- **enabling us to contact the User:** Pipedrive;
- **allowing Users to link to third-party accounts:** Disqus;
- **retargeting platforms:** Google Ads Remarketing, Google Analytics Remarketing, Facebook Custom Audience and Facebook Remarketing, LinkedIn retargeting, Twitter Ads retargeting;
- **sharing and advertising on social media:** Facebook, LinkedIn, Twitter, Instagram, Youtube;
- **user comments and forums:** Medium, Reddit;
- **web and mobile analytics:** Google Analytics, Metabusiness Suite, LinkedIn analytics, Twitter analytics;
- **website performance monitoring:** Sentry, Hotjar, Google Analytics, OVH, Ahrefs;
- **website testing:** Google Website Optimizer;
- **data backup and security:** Amazon S3;

- **offering our services, recruiting:** Clickmeeting, Nessie, Recruiitee, Pipedrive;
- **devices and technology support:** Apple.

5. Transfer of personal data to a third country

Users' data may be transferred to third countries, i.e. countries outside the European Economic Area as part of the Controller's use of entities providing IT solutions and systems, which entities may store personal data on servers located outside this area (including in the United States) or as part of the Controller's provision of business-related services – to the extent necessary for their performance:

- the basis for such transfer may be a decision of the European Commission confirming an adequate level of protection or on application of adequate legal safeguards, which are, in particular, standard contractual clauses of personal data protection approved by the European Commission, in the absence of a decision of the European Commission confirming an adequate level of protection or the provision of appropriate legal safeguards, personal data may be transferred to a third country on the basis of one of the grounds listed in Article 49(1) of the GDPR, including in particular on the basis of User's express consent. Users have the right to obtain a copy of personal data transferred to a third country.

6. User rights

In connection with the processing of personal data, you have the following rights:

6.1 The right to be informed which personal data concerning you are processed by the Controller and to receive a copy of such data (the so-called access right). The first copy of data is free of charge, whereas we may charge a fee for each subsequent copy thereof.

6.2 If the processed data becomes outdated or incomplete (or otherwise incorrect) you have the right to request rectification.

6.3 In certain situations you may request the Controller to delete your personal data, such as when:

- the data is no longer needed by the Controller for the purposes it has informed you about;
- you have effectively withdrawn your consent to process the data – unless the Controller has the right to process the data on another legal basis;
- the processing is unlawful;
- the need to delete the data is due to a legal obligation of the Controller.

6.4 In case your personal data is processed by the Controller on the basis of the consent granted for processing or in order to perform the contract concluded with the Controller, you have the right to transfer your data to another controller.

6.5 Where personal data is processed by the Controller on the basis of the processing consent you have given, you have the right to withdraw this consent at any time (withdrawal of consent does not affect the legality of the processing performed on the basis of consent before its withdrawal).

6.6 If you consider that the personal data processed is incorrect, its processing is unlawful, or the Controller no longer needs certain data, you may request that for a certain necessary period of time (e.g. to verify the correctness of the data or to pursue claims) the Controller does not perform any operations on the data, but only store it.

6.7 You have the right to object to the processing of personal data based on the legitimate interests of the Controller. If you successfully raise an objection, the Controller will stop processing your personal data for the aforementioned purpose.

6.8 You have the right to lodge a complaint with the President of the Personal Data Protection Office if you consider that the processing of personal data violates the provisions of the GDPR.

7. Personal data security

7.1 Our goal is to protect your personal data by means of a properly implemented organizational system and technical security measures that are designed to ensure a high degree of protection for the personal data we process. Please note, however, that we cannot guarantee that simply navigating the Internet is completely secure. Although we make every effort to protect our Users' data, the mere transmission of data to our Websites is at the User's own risk, who should only access services in a secure environment.

7.2 The Controller conducts a risk analysis on an ongoing basis to ensure that personal data is processed by it in a secure manner – ensuring, above all, that only authorized persons have access to the data and only to the extent necessary for their tasks. The Controller shall ensure that all operations on personal data are recorded and performed only by authorized employees and associates.

7.3 The Controller shall take all necessary measures to ensure that its subcontractors and other cooperating entities also provide a guarantee of the application of appropriate security measures whenever they process personal data on behalf of the Controller.

8. Controls for the “Do not track” feature

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting that you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. There is no uniform technological standard for recognizing and implementing DNT signals. Accordingly, we currently do not respond to browser DNT signals or any other mechanism that automatically communicates your choice not to be tracked online. If an online tracking standard is adopted in the future that we are obligated to follow, we will inform our Users of this practice in an updated version of our Privacy Policy.

9. Third Party Services

The Website may contain social plugins, features or links to Websites or services provided by third parties such as Clutch, Facebook, Instagram, Youtube, Twitter, LinkedIn, Github, Medium, Financial Times. All information you provide on these Websites or services is provided directly to the third party and is subject to its privacy policy. This means that we are not responsible for the content or the privacy and security practices of third-party services linked to or accessed by our Website. However, we guarantee that our transfer of your personal information to a third party is based on a valid contractual agreement that provides adequate protection of your personal information on the same basis as set forth in this Policy. Please refer to the privacy policies of third parties for more information.

10. Third Part Cookies

We may allow third parties with whom we have separate agreements to use cookies and other technologies to collect information about your use of the websites. These third parties may include business partners that collect information when you browse or interact with one of their advertisements, and advertising networks that collect information about your interests when you browse or interact with their advertisements.

11. Updating the Policy

We may update this Policy due to changing laws and good practices regarding protecting personal data that we follow. If we make material changes to this Policy, we may notify you by publishing a notice of such changes in a prominent place or by sending you a notice directly. We encourage you to review our Policy for information on how we protect your personal data.

12. Final provisions

To the extent not covered by the Policy, the generally applicable data protection laws shall apply.

The Policy is effective as of **01.10.2024**

