

# PRIVACY POLICY

## I. GENERAL REMARKS

The aim of this document (hereinafter referred to as the “**Policy**”) is to explain how we, **Signal OS Tech sp. z o.o.** (hereinafter referred to as “**We/Us**” or “**Signal OS**”), when you use our services and products (“**Signal OS Product**”), interact with Us and when you visit one of our websites (“**Website**”):

- <https://www.signalos.io>
- <https://www.parkiza.com>
- <https://www.wayin.io>

The Policy provides information about how We process your personal data, and in particular:

- identifies the types of personal data We collect;
- explains how and why We collect and use your personal data;
- explains when and why We will share personal data with other entities; and
- explains the rights and choices you have regarding your personal data.

We want it to be clear to you whether the Policy also applies to the processing of your personal data.

The Policy applies if you are a :

- **user of one of Signal OS Products**, being Parkiza, Way-In, Visitors or other made available by Signal OS;
- **visitor to the Website**, i.e. you make a visit to the Website or contact Us via a contact form;
- **Subscriber**, i.e. you have subscribed to Our newsletter;
- **Business Partner**, i.e. you provide any products or services to Us, use Our services or work with Us on joint ventures;
- **Business Partner’s Representative**, i.e., you represent a Business Partners;
- **Job Candidate**, i.e. you participate in Our recruitment process under Labor Code or you send Us your application documents for this or future recruitment processes;
- **Candidate for Contractor**, i.e. you are a sole proprietor or a representative of an entity and participate in Our recruitment process or you send Us your application documents for this or future recruitment processes.

This Policy is supposed to help you understand how We collect data, for what purposes and how you can exercise your rights pursuant to the Regulation 2016/679 (hereinafter referred to as “**GDPR**”). In the matters concerning data processing in relation to visiting the Website or using Signal OS Products, you can contact Us at [contact@signalos.io](mailto:contact@signalos.io).

## II. DATA CONTROLLER

The data controller of your personal data is **Signal OS Tech sp. z o.o.** with its registered seat in Warsaw, Plac Europejski 1, 00-844 Warsaw, entered into the register of entrepreneurs of the National Court Register, kept by the District Court for the Capital City of Warsaw in Warsaw, XII Commercial Division of the National Court Register under number KRS: 926854, NIP: 5272974115, REGON: 520194310.

In matters related to the processing of personal data you can contact Us by mail or by e-mail [contact@signalos.io](mailto:contact@signalos.io)

We have also appointed a Data Protection Officer with whom you can contact at by mail (at Signal OS address) or by e-mail: [gdpr@signalos.io](mailto:gdpr@signalos.io).

### III. WHAT INFORMATION WE COLLECT

**If you are a user of one of the Signal OS Products,** we collect the data you provide when registering for an account and certain information about your use of the Signal OS Products. This may include, in particular, your first name, last name, email address, job title, registration and login date. In relation to other data collected and generated during your use of Signal OS Products, we are the processor of such data and process it on behalf of and on behalf of the entity that has granted you access to the relevant Signal OS Product ("**Customer**").

**If you are a visitor to the Website,** We collect information during your use of the Website, during conversations, when you exchange emails, when you fill out a contact form. This may include, but is not limited to, your name, mailing address, email address, and phone number.

**If you are a Subscriber,** We collect your data provided in a newsletter form, i.e. e-mail address.

**If you are a Business Partner,** We collect information provided to us in the documents sent by you, during conversations and e-mail exchanges, including in particular information necessary to conclude and perform an agreement. This may include, in particular, your name, surname, e-mail address, telephone number, company, business address, PESEL, NIP, REGON, bank account number. Your data may also come from publicly available sources.

**If you are a Business Partner's Representative,** We collect information provided to us in the documents sent by you, during conversations and e-mail exchanges. This may include, in particular, your name, contact details, position, data concerning the entity you represent. Your data may also be provided to us by the entity you represent both before and during your cooperation with us.

**If you are a Job Candidate,** We collect information provided to us in the documents sent by you, in the forms filled in by you on the Website, during conversations and e-mail exchanges. This may include, in particular your name, date of birth, contact details, education, professional qualifications and previous employment history, as well as other personal data which you provide to us on your own initiative. Remember that providing your personal data to the extent stipulated by law, including art. 22<sup>1</sup> § 1 and 4 of the Labor Code (*Kodeks Pracy*), is necessary to participate in the recruitment procedure. Providing the remaining data is voluntary, and their omission will not result in any negative consequences towards you, especially it will not constitute a reason justifying refusal to employ you.

**If you are a Candidate for Contractor,** We collect information provided to us in the documents sent by you, in the forms filled in by you on the Website, during conversations and e-mail exchanges. This may include, in particular your name, date of birth, contact details, education, professional qualifications and previous employment history, as well as other personal data which you provide to us on your own initiative.

### IV. WHY AND ON WHAT BASIS WE PROCESS YOUR DATA

**If you are a user of one of the Signal OS Products,** We process your data:

- for the purpose of Our legitimate interests, i.e. to ensure security, to grant access to Signal OS products, to customize the functionality of Signal OS Products, to link your account with your customer account, to contact you in response to your questions, requests, comments, to handle your request directed via the contact form or by other means, to investigate and defend against claims and complaints, for reporting purposes, internal administrative and marketing purposes (Article 6(1)(f) of the GDPR);

**If you are a visitor to the Website,** We process your data:

- for the purpose of Our legitimate interests, i.e. for ensuring security, running the Website, adapting the Website's functionality to users' needs, for the purpose of contact in response to your questions, requests, comments, for the purpose of handling your request directed via the

contact form or by other means, for reporting purposes, internal administrative and marketing purposes (Article 6(1)(f) of the GDPR);

**If you are a Subscriber**, We process your data:

- on the basis of your consent (Article 6(1)(a) of the GDPR) for provision of newsletter via e-mail;

**If you are a Business Partner**, We process your data:

- for the conclusion and performance of the contract (art. 6(1)(b) of the GDPR);
- in order to comply with legal obligations (Article 6(1)(c) of the GDPR), in particular with regard to the settlement of tax debts and the storage of financial records;
- in order to pursue Our legitimate interests (Article 6(1)(f) of the GDPR) related to the operation of the business, the Website, maintaining business relationships, ongoing contact, conducting marketing activities, as well as pursuing and defending against claims;

**If you are a Business Partner's Representative**, We process your data:

- in order to pursue Our legitimate interests (Article 6(1)(f) of the GDPR) related to entering into and performing a contract with the entity you represent, maintaining business relations and ongoing contact, conducting marketing activities, as well as pursuing and defending against claims;

**If you are a Job Candidate**, We process your personal data:

- on the basis of your consent for the current and future recruitment processes (Article 6(1)(a) of the GDPR);
- for the purpose of concluding an employment agreement (Article 6(1)(b) of the GDPR)
- on the basis of your consent in regard to special category data if you have provided it to us on your own initiative (Article 9(2)(a) of the GDPR);
- in order to comply with the Signal OS's legal obligations as an employer and the corresponding rights of a job applicant under the law, including employment law (Article 6(1)(c) of the GDPR);
- in order to pursue Our legitimate interests (Article 6(1)(f) of the GDPR) related to the operation of the Website, ongoing contact, providing you with information about job opportunities, as well as pursuing and defending against claims;

**If you are a Candidate for Contractor**, We process your personal data:

- on the basis of your consent for the current and future recruitment processes (Article 6(1)(a) of the GDPR);
- for the purpose of concluding a cooperation agreement (Article 6(1)(b) of the GDPR)
- in order to comply with legal obligations (Article 6(1)(c) of the GDPR), in particular with regard to the settlement of tax debts and the storage of financial records;
- on the basis of your consent in regard to special category data if you have provided it to us on your own initiative (Article 9(2)(a) of the GDPR);
- in order to pursue Our legitimate interests (Article 6(1)(f) GDPR) related to the ongoing contact, providing you with information about job opportunities, as well as pursuing and defending against claims.

## **V. WHO DO WE SHARE YOUR DATA WITH**

When necessary for the purposes for which we process your data, We may make your data available to:

- a. entities entitled to receive them under the law;
- b. entities processing personal data on our behalf, i.e. companies providing certain services for us, the performance of which involves the processing of personal data. For example, entities providing us with HR and finance, marketing or hosting services, entities providing us with consultancy services and others (so-called "processors");
- c. entities within the capital group of which Signal OS is a part.

Whenever we share your data, we will ensure that the sharing has a legal basis and includes only the minimum information necessary to fulfill the purpose of the processing for which the data is being shared.

If necessary for the purposes referred to in Section IV., your data may be transferred outside the European Economic Area. In any transfer of your data outside the EEA we will ensure the highest level of security.

## VI. HOW LONG WE STORE YOUR DATA

**If you are a user of one of the Signal OS Products**, we keep your data for as long as you have been granted access to the relevant Product, after which time we process your data for administrative and claims and complaints purposes.

**If you are a visitor to the Website**, We will retain your personal information as long as necessary for the purposes of operating the Website.

**If you are a Subscriber**, We will process data until you withdraw your consent.

**If you are a Business Partner or its Representative**, We store your data for the period of performance of the contract concluded with you or the entity you represent. After that period, to the extent necessary, we will retain your data for the period resulting from legal requirements (e.g. the obligation to keep financial records for 5 years), statutes of limitation on claims (3 years for the statute of limitations on claims arising from business activities), or as necessary to fulfill the other purposes of data processing indicated in this Policy.

**If you are a Job Candidate or Candidate for Contractor**, We will hold your data until the end of the recruitment process, and longer only if you have consented to us processing it for future processes.

## VII. YOUR RIGHTS

In exercising your rights in relation to the processing of your personal data, you may direct the following requests to us:

- a. where we process your personal data on the basis of your consent, you may withdraw that consent at any time; withdrawal of consent does not affect the lawfulness of the processing we have carried out on the basis of that consent up to the time of withdrawal;
- b. you can request access to and obtain a copy of your personal data;
- c. you can request rectification of your personal data if it is incorrect or incomplete;
- d. the right to data portability;
- e. in relation to your particular situation, you may object to the processing of your personal data where we are processing it on the basis of our legitimate legal interest;
- f. in cases provided for by law - e.g. if your data is outdated, redundant, processed unlawfully, and if you have withdrawn your consent to the processing of your personal data (where consent was the

basis for such processing) or you have successfully raised an objection to the processing of your personal data - you can request the erasure of your personal data;

g. you can also request the restriction of data processing.

In order to exercise the above rights, please contact us by correspondence or at the following email address: [contact@signalos.io](mailto:contact@signalos.io)

In any case in which you consider that our processing of your personal data violates the provisions of the GDPR, you also have the right to lodge a complaint with the President of the Office for Personal Data Protection (*Prezes Urzędu Ochrony Danych Osobowych*).

## **VIII. DO YOU HAVE TO PROVIDE YOUR DATA AND WHERE DO WE GET THEM IF THEY ARE NOT PROVIDED BY YOU**

It is fully optional for you to give Us your data; however, without it we will not be able to realize the objectives stipulated above, and in particular we will be unable to:

- a. answer your request;
- b. grant you access to the relevant Signal OS Product;
- c. provide you with newsletter;
- d. enter into an agreement or perform such an agreement;
- e. provide you with services or receive your services;
- f. perform the recruitment process.

**If you are a user of one of the Signal OS Products** and you do not provide us with your data yourself, it comes from the Customer.

**If you are a Business Partner's Representative** and you do not provide Us with your data yourself, it comes from the entity you represent or it has been collected by us from publicly available sources (e.g. the entity's website).

**If you are a Job Candidate or Candidate for Contractor** and you do not provide Us with your data yourself, your data comes from publicly available sources, such as LinkedIn.